

NOTICE OF COMPLIANCE/NON-COMPLIANCE

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
Division of Environment
Waste Management Program

Initial Inspection: Yes No Follow-up Inspection: Yes No Complaint: Yes No
Hazardous Waste: LDF() TSF(~~GEN~~) KG() SQ() UNV() NOT A-GEN() OTHER()
Used Oil: UOG() UOT() UOM() UOP() UOB()
Solid Waste: SLF() TRS() CDL() ILF() YWC() SWP() HHW() OBS() MTP() WTM() WTP() WTR() WTT()

Solid waste: SLF () TRS () CDE () LLI () TWS () SWR () LLI ()

TO: Clean Harbors Kansas LLC 6, 20, 06
Date

2549 N. New York Wichita KS 67219 Sedgwick
Facility Name
Address City State Zip Code County

K	S	D	0	0	7	2	4	6	8	4	6
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EPA Identification No.

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Solid Waste Permit No.

This inspection was conducted to determine compliance with the state and federal solid and/or hazardous waste statutes and regulations.

☒ Violations As Follows

☐ No Violations Identified

- | Citation | Description of Violation |
|---|---|
| ① Permit Section II.F.
40 CFR 265.16 | Failure to comply with personnel training per the permit; No training in 2005 For Brian Key, Nathan Embury + Karyn Hetherington |
| ② KSA 65-3441(a)(4) | Illegal disposal of hazardous waste (absorbent pad, PPE, + flour dry) |

RCRA



551082

☒ Other Comments/Concerns:

- Other Comments/Concerns: (A) Retrain Field Chemist on how to handle hazardous waste generated in the field.

This notice is provided to call immediate attention to those areas of non-compliance. This notice does not constitute a compliance order issued by KDHE and may not be a complete listing of all violations which may be identified as a result of this inspection. Your facility must submit in writing within 30 days of receipt of this notice a description of all corrective actions taken. Any corrective actions taken by your facility will be considered in subsequent enforcement follow-up.

Your response must be submitted to: Debbie Travis

**Kansas Department of Health and Environment
South Central District Office
Waste Management Program
130 S. Market, Suite 6050
Wichita, Kansas 67202-3802**

If you have any questions concerning this Notice or wish to discuss your response, you may call me at (316) 337-6020 or Bureau of Waste Management in the Topeka office at (785) 296-1600.

This Notice was prepared by:

This Notice was prepared by:
Robert Krawin

Date 6, 20, 06

I, the undersigned hereby acknowledge that I have received and read this Notice.

Printed Name: C. Brian Kees

Signature: Chaitanya Kumar

Title: TS General Manager

Date 6 / 20 / 06

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I, the undersigned hereby acknowledge that I have received and read this Notice

Printed Name: C. Brian KeySignature: Charles Brian KeyTitle: TS General ManagerDate 6, 20, 06



KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT

BUREAU OF WASTE MANAGEMENT
BUREAU OF ENVIRONMENTAL FIELD SERVICES



**COMPLIANCE INSPECTION CHECKLIST
COVER PAGE**

General

☒ Routine

☐ Complaint

EPA/ ID/Permit No. KSD 007 246 846 Time 8:45 a.m. Date 6/19&20/06

Facility Name Clean Harbors Kansas LLC District Southcentral

Street 2549 N. New York City Wichita, KS ZIP 67219

Mailing Address (if different than above) same

County Sedgwick Number of Employees 12

Phone 316-269-7498 & 602-462-2315 Fax 316-269-7455
e-mail key.brian@cleanharbors.com

Contact(s) C. Brian Key, Technical Service Manager, Lon Stewart, Site Contact is located in Phoenix, AZ
Inspector(s) Debbie Travis

Type of Business Hazardous Waste Transfer Facility

Operating Hours and Days 8:00 a.m. to 5:00 p.m., Monday through Friday

Lat/Long Location Method: GPS Garmin III Lat/Long Location Feature: Entrance

Latitude: (e.g. 37.57621) 37.72894 Longitude: (e.g. -101.57621) -97.31817

Has the Lat/Long been entered in the SW database? Yes ☐ No ☒

Hazardous Waste Inspection: ☒ Yes ☐ No

Generator Classification: ☐ Closed/Inactive ☐ Small Qty. Generator ☒ EPA Generator
☐ Not a Generator ☐ Kansas Generator ☒ Transporter

Other Regulated Activities: ☒ T/S/D Facility ☒ Tank System ☐ Subpart BB
(complete applicable checklist) ☒ Universal Waste Activities

Has the company declared any information/processes as trade secrets KSA 65-3447? NO
If yes, explain: _____

If facility is closed/inactive, or has recently moved please provide a brief description.

Used Oil Activities: ☐ Yes ☒ No

Does the facility have a total above-ground storage capacity of used oil (excluding containers less than 55-gallons) of more than 1,320 gallons? ☐ Yes ☐ No

If yes, then the facility is subject to SPCC requirements due to used oil activities.

Facility Used Oil Activities (Attach a checklist for each one marked):

☐ Generator ☐ Collection Center / Aggregation Point
☐ Transporter / Transfer Facility ☐ Used Oil Processor / Re-Refiner
☐ Used Oil Burner (Off-Spec Fuel) ☐ Used Oil Marketer

Attach all applicable checklists.

HAZARDOUS WASTE GENERATOR COMPLIANCE INSPECTION CHECKLIST

INDUSTRIAL WASTES GENERATED

List all hazardous wastes first, then list solid wastes.

Waste description or process	If waste is hazardous, list all HW ID numbers	Amount generated per month	Amount presently in storage	Oldest accumulation start date	Recycling or disposal method
Solids (PPE, floor debris, damaged containers and spill clean-up)	D001, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019 D020 through D029, D035, D039, D040, F001, F002, F003, F004, F005	~ 20 P	None	Na	Clean Harbors Kimball, NE
Liquid (Contaminated Rain Water)	D004, D005, D006, D007, D008, D009, D010, D011, D019, D018, D020 through D029, D035, D039, D040, F001, F002, F003, F004, F005	~ 1,000 P Depends on the amount of precipitation.	2- 55-gallon drums	6/6/06	Clean Harbors Kimball, NE
Fluorescent Lamps	D009	~ 25 P / year	None	Na	Clean Harbors Chicago, IL
Well Purge Water	Non-Hazardous	~ 2000 P / year	None	Na	Clean Harbors Waynoka, OK
Well Soil Cuttings	Non-Hazardous	500 P / year	None	Na	Clean Harbors
Solid Waste (trash)	Non-Hazardous	Varies	None	Na	Waste Management Wichita, KS

GENERAL REQUIREMENTS (GGR)

- | | YES | NO | NAV# |
|--|-------------------------------------|--------------------------|-------------------------------------|
| 1. Has the generator evaluated each potentially hazardous waste to determine if it is hazardous? KAR 28-31-4(b) [255] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| a. If waste was tested, was the analysis conducted by a laboratory certified by KDHE? KAR 28-31-4(b)(3)(A) [256] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. If waste was tested, are the results kept for three years from date the waste was last sent for on-site or off-site for treatment, storage or disposal? KAR 28-31-4(f)(1)(C) [257] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. If waste was not tested, did the generator use knowledge of the hazardous characteristics of the waste in light of the materials or processes used? KAR 28-31-4(b) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. If hazardous waste is disposed of via the sanitary sewer to a Publicly Owned Treatment Works (POTW), has the generator received written approval from the City - POTW? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 3. Has the facility obtained a Special Waste Disposal Authorization (SWDA) for each special waste? KAR 28-29-109(c) [258] | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| a. List each SWDA authorization number: _____ | | | |
| 4. If the generator treats or recycles hazardous waste on-site (such as in a still), do they count waste each time prior to being treated or recycled? KAR 28-31-4(o) [259] | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| a. If the waste is not counted, is it exempt because of a closed-loop system? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

GENERAL REQUIREMENTS:☒ **Compliance**☐ **Non-Compliance**☐ **NA****NOTIFICATION REQUIREMENTS FOR KANSAS AND EPA GENERATORS (GGR)**

- | | | | |
|--|-------------------------------------|--------------------------|--------------------------|
| 5. Has generator notified KDHE and obtained an EPA Identification Number? KAR 28-31-4(c)(1) [263] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 6. Is current notification accurate? KAR 28-31-4(c)(1) [264] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

NOTIFICATION REQUIREMENTS:☒ **Compliance**☐ **Non-Compliance**☐ **NA**

NON-ACCUMULATING SMALL QUANTITY GENERATOR REQUIREMENTS

YES NO NAV#

7. If the SQG is accumulating less than 55 pounds (25 kg.) of hazardous waste on-site,
- a. Is the SQG recycling, treating, or disposing of this waste on-site in an acceptable manner? KAR 28-31-4(m)(2) [268]
- b. Is the SQG sending this waste off-site for treatment, storage, or disposal? KAR 28-31-4(m)(2) [269]

☐ ☐ ☐

☐ ☐ ☐

NON-ACCUMULATING SQG REQUIREMENTS:☐ Compliance☐ Non-Compliance☒ NA

(If Small Quantity Generator Non-Accumulating, stop here)

Generator Checklist Revised September 29, 2004

ACCUMULATING SMALL QUANTITY GENERATOR REQUIREMENTS

8. If the SQG is accumulating 55 pounds (25 kg.) or more of hazardous waste,
- a. Is the SQG recycling, treating, or disposing of this waste on-site in an acceptable manner? KAR 28-31-4(m)(2) [268]
- b. If the SQG is sending waste off-site for treatment, storage, or disposal, is the waste sent to a TSD or some other approved waste management facility? KAR 28-31-4(m)(2) [269]

☐ ☐ ☐

☐ ☐ ☐

ACCUMULATING SQG REQUIREMENTS:☐ Compliance☐ Non-Compliance☒ NA**PRE-TRANSPORT REQUIREMENTS (GPT)**

9. Does generator package [273], label [274] (flammable liquid, poison, etc.), and mark [275] (consignee's or consignor's name and address, etc.) waste in accordance with the requirements outlined in 49 CFR Parts 172, 173, 178, and 179 (DOT)? KAR 28-31-4(e) [276]
- a. Does the generator mark each container of 110 gallons or less as shown below? KAR 28-31-4(e)(3)(B) [277]

☒ ☐

☒ ☐ ☐

Hazardous Waste-Federal Law Prohibits Improper Disposal.

If found, contact the nearest police or public safety authority or the US EPA.

*Generator's Name and Address
Manifest Document Number*

10. Does the generator only use a transporter who has registered with KDHE and obtained an EPA Identification Number? KAR 28-31-4(c)(2) [278]

☒ ☐

PRE-TRANSPORT REQUIREMENTS:☒ Compliance☐ Non-Compliance☐ NA

Storage Requirements (GPT)

YES NO NAV#

11. If the generator temporarily stores waste in containers,
- a. Is the accumulation start date marked on each container?
KAR 28-31-4(g)(2) [303] or KAR 28-31-4(h)(3) [291] or
KAR 28-31-4(m)(2)(B) [282] ☒ ☐ ☐
 - b. Is each container clearly marked with the words "Hazardous Waste"?
KAR 28-31-4(g)(3) [304] or KAR 28-31-4(h)(4) [292] or
KAR 28-31-4(m)(2)(B) [283] ☒ ☐ ☐
 - c. Are all containers holding hazardous waste in good condition [305, 293, 284] and
closed [306, 294, 285] during storage except when necessary to add or remove
waste? KAR 28-31-4(g)(1)(A) or KAR 28-31-4(h)(2)(A) or KAR 28-31-4(m)(2)(B) ☒ ☐ ☐
 - d. Does generator conduct weekly inspections of containers for signs of leakage
and/or deterioration caused by corrosion or other factors?
KAR 28-31-4(g)(1)(A) [307] or KAR 28-31-4(h)(2)(A) [295] or
KAR 28-31-4(m)(2)(B) [286] ☒ ☐
 - A. If yes, are these inspections documented in a log that includes
complete date and time of inspection, name of inspector,
notations of observations, and date and nature of remedial
actions? KAR 28-31-4(k) [308, 296, 287] ☒ ☐
12. If SQG or Kansas generator is accumulating 2,200 lbs. (1,000 kg.) or more of
hazardous waste or 2.2 lbs (1 kg.) or more of acutely hazardous waste, then
check yes and continue with EPA generator requirements. ☐ ☒

STORAGE REQUIREMENTS☒ **Compliance**☐ **Non-Compliance**☐ **NA**

(If Small Quantity Generator Accumulating <1,000 Kilograms, stop here)

Genlist9-29-04.doc Revised February 16, 2006

STORAGE REQUIREMENTS FOR KANSAS AND EPA GENERATORS (GPT)

YES NO NAV#

13. If waste in containers is incompatible with other materials stored nearby, are the containers separated from the other materials by means of a dike, berm, wall, or other means? **KAR 28-31-4(g)(1)(A) [311] or KAR 28-31-4(h)(2)(A) [299]** ☒ ☐ ☐
14. Is EPA generator storing hazardous waste for 90 days or less? **KSA 65-3441(a)(2) [312]** ☒ ☐ ☐
15. Are containers holding ignitable or reactive waste(s) located at least 50 feet (15 meters) from the generator's property line? (EPA Generator Only) **KAR 28-31-4(g)(1)(A) [313]** ☒ ☐ ☐

If waste is managed in a tank system, complete the tank checklist. Complete Subpart BB checklist if organic waste contacts piping, valves, pumps, etc. (See 40 CFR 265.1050 for applicability)

STORAGE REQUIREMENTS:☒ **Compliance**☐ **Non-Compliance**☐ **NA****SATELLITE ACCUMULATION REQUIREMENTS FOR KANSAS AND EPA GENERATORS (GPT)**

16. If the Kansas or EPA generator has satellite accumulation areas,
- a. Is 55-gallons or less of each waste stream [317] accumulated at or near the point of generation [318], in one container [319], which is under the control of the operator of the process generating that waste? [320] **KAR 28-31-4(j)(1)** ☒ ☐
- b. Is each container in good condition [321] and closed except to add or remove waste? [322] **KAR 28-31-4(j)(1)(A)** ☒ ☐
- c. Is each container marked with the words "Hazardous Waste"? **KAR 28-31-4(j)(1)(B) [323]** ☒ ☐
- d. Is each container marked with the accumulation start date at the time more than 55-gallons is accumulated, or an additional container is started for the same waste stream? **KAR 28-31-4(j)(2) [324]** ☐ ☐ ☒
- e. Is each container managed as a storage container within three days of no longer meeting the definition of a satellite container? **KAR 28-31-4(j)(2) [325]** ☐ ☐ ☒

SATELLITE ACCUMULATION REQUIREMENTS☒ **Compliance**☐ **Non-Compliance**☐ **NA**

MANIFESTS REQUIREMENTS FOR KANSAS AND EPA GENERATORS (GMR)

YES NO NAV#

17. If a contractual agreement is used in place of manifesting, (Kansas Generators only)
- Does the contractual agreement include the type of waste and frequency of shipments? **KAR 28-31-4(d)(7)(A) [329]** ☐ ☐ ☒
 - Is the vehicle used to transport the waste owned and operated by the reclaimer of the waste? **KAR 28-31-4(d)(7)(B) [330]** ☐ ☐ ☒
 - Is a copy of the agreement kept for a period of three years after termination of agreement? **KAR 28-31-4(d)(7)(C) [331]** ☐ ☐ ☒
18. If required, is a hazardous waste manifest used? **KAR 28-31-4(d)(1) [335]** ☒ ☐ ☐
- If yes, does each manifest include:
 - Generator EPA identification number (12-digit) [336] and a unique 5-digit manifest document number? [337] **KAR 28-31-4(d)(1) [338]** ☒ ☐
 - Number of pages? **KAR 28-31-4(d)(1) [338]** ☒ ☐
 - Generator's name and mailing address? **KAR 28-31-4(d)(1) [339]** ☒ ☐
 - Generator's phone number? **KAR 28-31-4(d)(1) [340]** ☒ ☐
 - Each transporter's name? **KAR 28-31-4(d)(1) [341]** ☒ ☐
 - Each transporter's EPA identification number? **KAR 28-31-4(d)(1) [342]** ☒ ☐
 - Name and site address of designated facility? **KAR 28-31-4(d)(1)(A) [343]** ☒ ☐
 - Designated facility's EPA identification number? **KAR 28-31-4(d)(1) [344]** ☒ ☐
 - Waste description (DOT shipping name, hazard class, packing group and identification number)? **KAR 28-31-4(d)(1) [345]** ☒ ☐
 - For waste using a "n.o.s." description, are the requirements of 49 CFR 172.203(k) met? **KAR 28-31-4(d)(1) [346]** ☒ ☐ ☐
 - Number [347] and type of containers? **KAR 28-31-4(d)(1) [348]** ☒ ☐
 - Total quantity? **KAR 28-31-4(d)(1) [349]** ☒ ☐
 - Unit (weight or volume)? **KAR 28-31-4(d)(1) [350]** ☒ ☐
 - Special handling instructions (if applicable)? **KAR 28-31-4(d)(1) [351]** ☒ ☐
 - Generator's certification including waste minimization statement [352], generator's signature [353] and date? [354] **KAR 28-31-4(d)(4)(A)** ☒ ☐
 - Name [355], signature [356], and date [357] of initial transporter? **KAR 28-31-4(d)(4)(B)** ☒ ☐
 - Does generator retain a copy of each initial manifest signed and dated by both generator and transporter? **KAR 28-31-4(d)(4)(C) [358]** ☒ ☐ ☐
 - Does generator retain a copy of each manifest for three years that was signed and dated by a representative of the designated facility? **KAR 28-31-4(f)(1)(A) [359]** ☒ ☐ ☐
 - If generator has failed to receive a signed copy of a manifest within 45 days of initiating a shipment, was an exception report filed? **KAR 28-31-4(f)(4)(B) [360]** ☐ ☐ ☒
 - If yes, was a copy retained for three years? **KAR 28-31-4(f)(1)(B) [361]** ☐ ☐ ☒

MANIFESTING REQUIREMENTS

☒ **Compliance**

☐ **Non-Compliance**

☐ **NA**

LAND DISPOSAL RESTRICTION REQUIREMENTS FOR KANSAS AND EPA GENERATORS (GLB)

YES NO NA V#

19. If the generator's waste is not subject to the Land Disposal Restrictions regulations, please explain why: _____

20. If the generator sent waste **not meeting** the treatment standards to an off-site treatment or storage facility, did the generator provide a one-time written notice with the initial shipment of each different waste stream? **KAR 28-31-14/40 CFR 268.7(a)(2) [365]**

☒ ☐ ☐

a. Did the notice include: EPA hazardous waste number [366], manifest number [367], F001-F005, F039 constituents and each underlying hazardous constituents to be monitored (unless all monitored) [368], wastewater or non-wastewater classification [369], waste subcategory (if any) [370], and waste analysis data, if available [371]? **KAR 28-31-14/40 CFR 268.7(a)(2)**

☒ ☐ ☐

21. If the generator sent waste **meeting** the treatment standards to an off-site treatment, storage facility, or disposal facility, did the generator provide a one-time written notice and signed certification statement with the initial shipment to each TSD receiving the waste which certified the waste met the applicable treatment standards? **KAR 28-31-14/40 CFR 268.7(a)(3) [372]**

☐ ☐ ☒

a. Did the notice include: EPA hazardous waste number [366], manifest number [367], F001-F005, F039 constituents and each underlying hazardous constituents to be monitored (unless all monitored) [368], wastewater or non-wastewater classification [369], waste subcategory (if any) [370], and waste analysis data, if available [371]? **KAR 28-31-14/40 CFR 268.7(a)(2)**

☐ ☐ ☒

22. If the generator treated waste in tanks or containers to meet applicable treatment standards:

a. Did the generator have a written waste analysis plan on-site describing procedures used to comply with the treatment standards? **KAR 28-31-14/40 CFR 268.7(a)(5) [373]**

☐ ☐ ☒

b. If the generator sent the treated waste off-site, did the generator provide a notice and signed certification statement with the initial shipment? **KAR 28-31-14/40 CFR 268.7(a)(5)(iii) [374]**

☐ ☐ ☒

23. Has the generator retained copies of all notices, certifications, waste analysis data, and other documents for at least 3 years from the last date the corresponding waste was last managed on-site or shipped off-site? **KAR 28-31-14/40 CFR 268.7(a)(8) [375]**

☒ ☐ ☐

24. If the generator claims that his characteristic waste, including all applicable underlying hazardous constituents, is no longer hazardous:

a. Did the generator submit a one-time notice and signed certification to the KDHE and retain a copy for their files? **KAR 28-31-14/40 CFR 268.9(d) [376]**

☐ ☐ ☒

b. Is the information on the notice and certification current? **KAR 28-31-14/40 CFR 268.9(d) [377]**

☐ ☐ ☒

Note: If a generator's waste is subject to any Land Disposal Restriction regulations not covered above, then please discuss these situations in the summary.

LDR REQUIREMENTS:

☒ Compliance

☐ Non-Compliance

☐ NA

SPECIAL CONDITIONS (GSC)

25. If the generator has shipped/received hazardous waste to/from a foreign source, did they comply with the requirements of 40 CFR 262.53 and/or 40 CFR 262.54?

YES NO NA V#

☐ ☐ ☐

If hazardous waste was shipped/received to/from a foreign source, please describe in summary.

SPECIAL CONDITIONS REQUIREMENTS:☐ Compliance☐ Non-Compliance☒ NA**KANSAS GENERATOR'S EMERGENCY PREPAREDNESS REQUIREMENTS (GPT)**

26. Has generator designated at least one employee as an emergency coordinator?
KAR 28-31-4(h)(6) [381]

☐ ☐

- a. Is the emergency coordinator on the premises or available to respond to an emergency by reaching the facility within a short period of time? KAR 28-31-4(h)(6) [382]
- b. Is the emergency coordinator or his/her designee prepared to respond to any emergencies (fires, spills, or releases) that arise? KAR 28-31-4(h)(9) [383]

☐ ☐☐ ☐

27. Is the following information posted next to at least one telephone which is accessible with little or no delay in an emergency? KAR 28-31-4(h)(7) [384]

- a. Name and telephone number of emergency coordinator(s)?
KAR 28-31-4(h)(7)(A) [385]

☐ ☐

- b. Location of fire extinguishers and spill-control material, and if available, fire alarms?
KAR 28-31-4(h)(7)(B) [386]

☐ ☐

- c. Telephone number of fire department unless facility has a direct alarm (911 is acceptable)? KAR 28-31-4(h)(7)(C) [387]

☐ ☐

28. Have employees been trained so that they are familiar with proper waste handling and emergency procedures that are relevant to their responsibilities during normal facility operations? KAR 28-31-4(h)(8) [388]

☐ ☐**KS GEN.'S EMERGENCY PREPAREDNESS REQ.**☐ Compliance☐ Non-Compliance☒ NA**HAZARDOUS WASTE REPORTING REQUIREMENTS FOR KANSAS AND EPA GENERATORS (GRR)**

29. Has Kansas generator submitted an annual monitoring fee to KDHE?
KAR 28-31-10(g)(3) [392]

☐ ☐ ☒

30. Has EPA generator submitted an annual monitoring fee and report to KDHE?
KAR 28-31-4(f)(3) [396]

☒ ☐ ☐

31. Has EPA generator submitted biennial report(s) to KDHE?
KAR 28-31-4(f)(2)(A) [397]

☒ ☐ ☐

- a. Does generator retain a copy of the report for three years?
KAR 28-31-4(f)(1)(B) [398]

☒ ☐ ☐**HAZARDOUS WASTE REPORTING REQUIREMENTS**☒ Compliance☐ Non-Compliance☐ NA

PREPAREDNESS AND PREVENTION REQUIREMENTS FOR KANSAS AND EPA GENERATORS (GPT)

YES NO NA V#

32. Has the generator maintained and operated the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents? KAR 28-31-4(g)(4) [418] or KAR 28-31-4(h)(5)/40 CFR 265.31 [402] ☒ ☐ ☐
33. **If appropriate**, based upon the nature and quantity of each waste generated and stored at the facility, is the facility equipped with:
- a. Internal communication or alarm system easily accessible in case of emergency? KAR 28-31-4(g)(4) [419] or KAR 28-31-4(h)(5)/40 CFR 265.32(a) [403] ☒ ☐ ☐
- b. Telephone or hand-held two-way radio capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams? KAR 28-31-4(g)(4) [420] or KAR 28-31-4(h)(5)/40 CFR 265.32(b) [404] ☒ ☐ ☐
- c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? KAR 28-31-4(g)(4) [421] or KAR 28-31-4(h)(5)/40 CFR 265.32(c) [405] ☒ ☐ ☐
- d. Water of adequate volume and pressure to supply hose streams, foam producing equipment, automatic sprinklers, and water spray systems? KAR 28-31-4(g)(4) [422] or KAR 28-31-4(h)(5)/40 CFR 265.32(d) [406] ☒ ☐ ☐
34. Is the equipment (32a-32c above) tested and maintained to ensure its proper operation? KAR 28-31-4(g)(4) [423] or KAR 28-31-4(h)(5)/40 CFR 265.33 [407] ☒ ☐ ☐
35. Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? KAR 28-31-4(g)(4) [424] or KAR 28-31-4(h)(5)/40 CFR 265.35 [408] ☒ ☐ ☐
36. **As appropriate**, for each type of waste handled, has the generator attempted to make the following arrangements:
- a. Familiarized the local emergency authorities with the facility, properties and hazards of each waste handled, locations of workers, entrances to facility roads and possible evacuation routes? KAR 28-31-4(g)(4) [425] or KAR 28-31-4(h)(5)/40 CFR 265.37(a)(1) [409] ☒ ☐ ☐
- b. Designated one authority where one or more police or fire departments might respond to an emergency? KAR 28-31-4(g)(4) [426] or KAR 28-31-4(h)(5)/40 CFR 265.37(a)(2) [410] ☒ ☐ ☐
- c. Made agreements with local emergency response teams, emergency response contractors, and equipment suppliers? KAR 28-31-4(g)(4) [427] or KAR 28-31-4(h)(5)/40 CFR 265.37(a)(3) [411] ☒ ☐ ☐
- d. Familiarized local hospitals with the properties of hazardous waste handled and types of injuries or illness which could result from fires, explosions, or releases at the facility? KAR 28-31-4(g)(4) [428] or KAR 28-31-4(h)(5)/40 CFR 265.37(a)(4) [412] ☒ ☐ ☐
37. Do personnel have immediate access to an internal alarm or emergency communications device, either directly or through visual or contact with another employee, when handling hazardous waste (unless such a device is not required under § 265.32)? KAR 28-31-4(g)(4) [429] or KAR 28-31-4(h)(5)/40 CFR 265.34 [413] ☒ ☐ ☐
38. In cases where local authorities decline to enter into such arrangements, is the refusal documented? KAR 28-31-4(g)(4) [430] or KAR 28-31-4(h)(5)/40 CFR 265.37(b) [414] ☐ ☐ ☒

PREPAREDNESS AND PREVENTION REQUIREMENTS: ☒ Compliance ☐ Non-Compliance ☐ NA

PERSONNEL TRAINING FOR EPA GENERATORS (GPT)

	YES	NO	NA	V#
39. Has the generator established a hazardous waste management training program? KAR 28-31-4(g)(4)/40 CFR 265.16(a)(1) [434]	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
a. Is the program directed by a person trained in hazardous waste management? KAR 28-31-4(g)(4)/40 CFR 265.16(a)(2) [435]	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
b. Are new personnel trained within six months after their employment or placement to a new position? KAR 28-31-4(g)(4)/40 CFR 265.16(b) [436]	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
c. Are new employees supervised until training is completed? KAR 28-31-4(g)(4)/40 CFR 265.16(b) [437]	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
d. After initial training, are employees trained on an annual basis? KAR 28-31-4(g)(4)/40 CFR 265.16(c) [438]	<input type="checkbox"/>	<input checked="" type="checkbox"/>		1
e. Does the generator maintain the following documents and records:				
1. Job title for each position related to hazardous waste management and the name of the employee filling each job? KAR 28-31-4(g)(4)/40 CFR 265.16(d)(1) [439]	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
2. Written job description for each position? KAR 28-31-4(g)(4)/40 CFR 265.16(d)(2) [440]	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
3. Description of type and amount of both introductory and continuing training to be given each person, including the implementation of the contingency plan? KAR 28-31-4(g)(4)/40 CFR 265.16(d)(3) [441]	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
4. Records of training or job experience completed by facility personnel? KAR 28-31-4(g)(4)/40 CFR 265.16(d)(4) [442]	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
5. Are training records kept on all current employees until closure of all hazardous waste units and all past employees for three years from last date of employment? KAR 28-31-4(g)(4)/40 CFR 265.16(e) [443]	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

PERSONNEL TRAINING REQUIREMENTS:

☐ Compliance

☒ Non-Compliance

☐ NA

CONTINGENCY PLAN FOR EPA GENERATORS (GPT)

	YES	NO	NA	V#
40. Does the generator have a contingency plan? KAR 28-31-4(g)(4)/40 CFR 265.51(a) [447]	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
If yes,				
a. Does the plan list the name, home address, and phone numbers (home and office) of each designated emergency coordinator in the order in which they should be contacted? KAR 28-31-4(g)(4)/40 CFR 265.52(d) [448]	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
b. Is an emergency coordinator available at all times? KAR 28-31-4(g)(4)/40 CFR 265.55 [449]	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
c. Does the plan describe emergency actions facility personnel must take to respond to fires, explosions, or releases of hazardous waste? KAR 28-31-4(g)(4)/40 CFR 265.52(a) [450]	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
d. Does the plan describe arrangements made with police, fire departments, hospitals, contractors, or any emergency response agency? KAR 28-31-4(g)(4)/40 CFR 265.52(c) [451]	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
e. Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of the capabilities of each item? KAR 28-31-4(g)(4)/40 CFR 265.52(e) [452]	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
f. Does the plan include an evacuation plan for facility personnel that describes signals and evacuation routes? KAR 28-31-4(g)(4)/40 CFR 265.52(f) [453]	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

- g. Have copies of the plan and any revisions been provided to the police and fire departments, hospitals, and any emergency response agency that may respond to an emergency? **KAR 28-31-4(g)(4)/40 CFR 265.53(b) [454]** ☒ ☐
- h. If implementation of the plan has been required at the facility, did the generator submit a written report on the incident to the KDHE within 15 days after the incident? **KAR 28-31-4(g)(4)/40 CFR 265.56(j) [455]** ☐ ☐ ☒

CONTINGENCY PLAN REQUIREMENTS:

☒ **Compliance**

☐ **Non-Compliance**

☐ **NA**

(If EPA generator, stop here.)

V# = Violation Number

SC = See Comments

GENLIST 10-27-04.doc: Generator Checklist Revised February 16, 2006

ADDITIONAL INFORMATION AND CONCLUSIONS:

Other items:

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE T/S/D FACILITY
COMPLIANCE INSPECTION CHECKLIST

(NOTE: Permit conditions take precedence over requirements set forth in this checklist.)

General

EPA ID KSD 007 246 846 Time 8:45 a.m. Date June 19 and 20, 2006
Facility Name Clean Harbors Kansas, LLC District SCDO
Street 2549 N. New York City Wichita Kansas Zip 67219
Mailing Address (if different than above) same
County Sedgwick Phone 316 269-7400
Contact(s) C. Brian Key, Technical Services General Manager
Inspector(s) Debbie Travis SIC: _____
Type of Business Hazardous Waste Transfer Facility Number of Employees 12
Has the company declared any information/process as trade secrets (KSA 65-3447)? NO
If yes, explain:

Activity at Site

Treatment

<input type="checkbox"/> Chem/Phys/Bio Treatment	<input type="checkbox"/> Incineration	<input type="checkbox"/> Thermal Treatment
<input type="checkbox"/> Containment Building	<input type="checkbox"/> Recycling/Recovery	<input type="checkbox"/> Volume Reduction
<input type="checkbox"/> Filtration	<input type="checkbox"/> Reprocessing	<input type="checkbox"/> Other _____

Storage

<input type="checkbox"/> Containment Building	<input type="checkbox"/> Surface Impoundment	<input checked="" type="checkbox"/> Other _____
<input checked="" type="checkbox"/> Drums	<input checked="" type="checkbox"/> Tank(s) (complete applicable checklist)	
<input type="checkbox"/> Pile		

Disposal

<input type="checkbox"/> Deep Well Injection	<input type="checkbox"/> Landfill	<input type="checkbox"/> Surface Impoundment
<input type="checkbox"/> Incineration	<input type="checkbox"/> Land Treatment	<input type="checkbox"/> Other _____

Comments:

Waste Analysis Plan (DGS)**YES NO NA**

- 1 Does facility maintain a copy of its waste analysis plan at the facility?
[264.13(b)/265.13(b)] ☒ ☐ ☐
- a. If yes, does the plan include:
- A. Parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters? [(264.13(b)(1)/265.13(b)(1))] ☒ ☐
- B. Test methods which are used to test for these parameters?
[264.13(b)(2)/265.13(b)(2)] ☒ ☐
- C. Sampling method used to obtain sample? [264.13(b)(3)/265.13(b)(3)] ☒ ☐
- D. Frequency with which the initial analysis will be reviewed or repeated to ensure the analysis is current? [264.13(b)(4)/265.13(b)(4)] ☒ ☐
- E. For off-site facilities, the waste analyses that generators have agreed to supply? [264.13(b)(5)/265.13(b)(5)] ☒ ☐ ☐
- F. For off-site facilities, the procedures which are used to inspect and analyze each movement of hazardous waste received to ensure that it matches the identify of the waste designated on the manifest?
[264.13(c)/265.13(c)] ☒ ☐ ☐

Waste Analysis Plan Requirements:☒ **Compliance**☐ **Non-Compliance**☐ **N/A****Security (DGS)**

- 2 Does the facility consider itself exempt from the security requirements as provided in 264.14(a)(1)&(2)/265.14(a)(1)&(2)? ☐ ☒
- If no,
- a. Does the facility provide either of the following:
- A. A 24-hour surveillance system (TV monitoring or guards)?
[264.14(b)(1)/265.14(b)(1)]; OR ☐ ☒ ☐
- B. An artificial or natural barrier (fence, fence and cliff combination) and a means to control entry (attendant, TV monitoring, locked entrance, controlled roadway access)? [264.14(b)(2)/265.14(b)(2)] ☒ ☐ ☐
- b. Has the facility posted warning signs at each entrance to the active portion of the facility, and at other locations, in sufficient numbers to be seen from any approach to the active portion? [264.14(c)/265.14(c)] ☒ ☐

Security Requirements:☒ **Compliance**☐ **Non-Compliance**☐ **N/A****General Inspection Requirements (DGS)**

- 3 Does the owner/operator follow a written schedule at the facility for inspecting monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment? [264.15(b)(1)/265.15(b)(1)] ☒ ☐
- 4 Does the owner/operator keep the written inspection schedule at the facility?
[264.15(b)(2)/265.15(b)(2)] ☒ ☐
- 5 Does the written inspection schedule identify the types of problems which are to be looked for during the inspections? [264.15(b)(3)/265.15(b)(3)] ☒ ☐
- 6 Does the owner/operator remedy any deterioration or malfunction of equipment or structures noted during the inspection? [264.15(c)/265.15(c)] ☒ ☐

7 Does the owner/operator record inspections in an inspection log or summary which contains the date and time of inspection, name of inspector, notation of observations, and the date and nature of remedial action? [264.15(d)/265.15(d)]

[X] []

Inspection Requirements: [X] Compliance [] Non-Compliance [] N/A

Personnel Training (DGS)

8 Does the owner/operator maintain, at the facility, the following documents and records: [264.16/265.16]

- | | | | |
|----|--|-------|-----|
| a. | Job title for each position related to hazardous waste management and the name of the employee filling each job? [264.16(d)(1)/265.16(d)(1)] | [X] | [] |
| b. | Written job description for each position? [264.16(d)(2)/265.16(d)(2)] | [X] | [] |
| c. | Written description of type and amount of training to be given each person? [264.16(d)(3)/265.16(d)(3)] | [X] | [] |
| d. | Records of training given to facility personnel? [264.16(d)(4)/265.16(d)(4)] | [X] | [] |

Personnel Training Requirements: [X] Compliance [] Non-Compliance [] N/A

Requirements for Ignitable, Reactive, or Incompatible Wastes (DGS)

9 Does the facility handle ignitable or reactive wastes? [264.17(a)/265.17(a)]

[X] []

If yes,

- | | | | |
|----|--|-------|-------|
| a. | Is the waste separated and confined from sources of ignition or reaction, sparks, spontaneous ignition and radiant heat? [264.17(a)/265.17(a)] | [X] | [] |
| b. | Are smoking and open flames confined to specially designated locations? [264.17(a)/265.17(a)] | [X] | [] |
| c. | Are "No Smoking" signs posted in hazard areas? [264.17(a)/265.17(a)] | [X] | [] |
| d. | Does a check of the areas used to handle ignitable or reactive wastes show: | | |
| A. | Evidence of heat generation from interaction of incompatible wastes? [264.17(b)(1)/265.17(b)(1)] | [] | [X] |
| B. | Evidence of uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment? [264.17(b)(2)/265.17(b)(2)] | [] | [X] |
| C. | Evidence of uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? [264.17(b)(3)/265.17(b)(3)] | [] | [X] |
| D. | Evidence of any leakage from or corrosion of containers? [264.17(b)(4)/265.17(b)(4)] | [] | [X] |

10 For permitted facilities only, when required to comply with paragraph (a) or (b) of 264.17/265.17, has the owner/operator documented that compliance? [264.17(c)]

[X] [] []

Ignitable, Reactive, or Incompatible Waste Contingency Plan Requirements:

[X] Compliance [] Non-Compliance [] N/A

Preparedness and Prevention (DPP)

11 Does an inspection of the facility show any evidence of fire, explosion, or contamination? [264.31/265.31]

[] [X]

- 12 If applicable to the facility, is the facility equipped with:
- a. Internal communication or alarm system easily accessible in case of emergency? [264.32(a)/265.32(a)] ☒ [X] ☐ [] ☐ [NA]
 - b. Telephone or hand-held two-way radio capable of summoning emergency response assistance from local police departments, fire departments, or State or local emergency response teams? [264.32(b)/265.32(b)] ☒ [X] ☐ [] ☐ [NA]
 - c. Portable fire extinguishers, fire control, spill control equipment, and decontamination equipment? [264.32(c)/265.32(c)] ☒ [X] ☐ [] ☐ [NA]
 - d. Water of adequate volume for hose streams, foam producing equipment, sprinklers, etc? [264.32(d)/265.32(d)] ☒ [X] ☐ [] ☐ [NA]
- 13 Is the equipment (mentioned above) tested and maintained to ensure its proper operation? [264.33/265.33] ☒ [X] ☐ [] ☐ [NA]
- 14 Whenever hazardous waste is being poured, mixed, spread, or otherwise handled:
- a. Do all personnel involved in the hazardous waste activity have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee? [264.34(a)/265.34(a)] ☒ [X] ☐ [] ☐ [NA]
 - b. Does an employee who is alone on the premises while the facility is operating have immediate access to a device capable of summoning external emergency assistance? [264.34(b)/265.34(b)] ☒ [X] ☐ [] ☐ [NA]
- 15 Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? [264.35/265.35] ☒ [X] ☐ [] ☐ [NA]
- 16 As appropriate for the type(s) of waste handled, has the owner/operator:
- a. Made arrangements with the local emergency authorities to familiarize them with the layout of the facility, properties of wastes handled and associated hazards, places where facility personnel normally work, entrances to roads inside the facility, and possible evacuation routes? [264.37(a)(1)/265.37(a)(1)] ☒ [X] ☐ [] ☐ [NA]
 - b. Designated one primary authority in areas where more than one police and fire department might respond? [264.37(a)(2)/265.37(a)(2)] ☒ [X] ☐ [] ☐ [NA]
 - c. Made agreements with state emergency response teams, emergency response contractors, and equipment suppliers? [264.37(a)(3)/265.37(a)(3)] ☒ [X] ☐ [] ☐ [NA]
 - d. Familiarized local hospitals, with the properties of hazardous waste(s) handled and types of injuries that could result from fires, explosions, or releases at the facility? [264.37(a)(4)/265.37(a)(4)] ☒ [X] ☐ [] ☐ [NA]
- 17 In cases where state or local authorities decline to enter into such arrangements, is the refusal entered in the operating record? [264.37(b)/265.37(b)] ☐ [] ☐ [] ☒ [X]

Preparedness and Prevention

Requirements: ☒ [X] Compliance ☐ [] Non-Compliance ☐ [] N/A

Contingency Plan and Emergency Procedures (DCP)

- 18 Is a contingency plan maintained at the facility and have copies been provided to outside agencies that may be called upon to provide emergency services? [264.53(a)/265.53(a)] ☒ [X] ☐ []
- a. If yes, does the plan:
 - A. Describe emergency actions facility personnel must take to respond to fires, explosions, or releases of hazardous waste? [264.52(a)/265.52(a)] ☒ [X] ☐ []

- B. Describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams? [264.52(c)/265.52(c)] [X] []
- C. List the name(s), home address(es), and phone number(s) of designated emergency coordinator(s) in the order in which they should be contacted? [264.52(d)/265.52(d)] [X] []
- D. Include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities? [264.52(e)/265.52(e)] [X] []
- E. Include an evacuation plan for facility personnel that describes signals and evacuation routes? [264.52(f)/265.52(f)] [X] []
- 19 Is an emergency coordinator available at all times? [264.55/265.55] [X] []
- 20 Has implementation of the plan been required at the facility? [] [X]
- a. If yes, was the facility required to submit a written report on the incident to the KDHE? [] []
- A. If yes, was the written report submitted? [264.56(j)/265.56(j)] [] []

Contingency Plan and Emergency Procedures Requirements:

[X] Compliance [] Non-Compliance [] N/A

Manifest System, Recordkeeping, and Reporting (DMR)

- 21 Does the facility receive waste from off-site? [264.71/265.71] [X] []
- a. If yes, does the owner/operator:
- A. Sign and date each copy of the manifest? [264.71(a)(1)/265.71(a)(1)] [X] []
- B. Note any significant discrepancies in the manifest on each copy of the manifest? [264.71(a)(2)/265.71(a)(2)] [X] []
- C. Give a signed copy to the transporter? [264.71(a)(3)/265.71(a)(3)] [X] []
- D. Send a signed copy of the manifest to the generator within 30 days of the delivery? [264.71(a)(4)/265.71(a)(4)] [X] []
- E. Retain a copy of the manifest for at least three years from the date of delivery? [264.71(a)(5)/265.71(a)(5)] [X] []
- 22 Does the facility receive any waste from a rail or water (bulk shipment transporter)? [] [X]
- a. If yes, is the shipment accompanied by a manifest or shipping paper containing the appropriate information? [264.71(b)/265.71(b)] [] []
- If yes, does the owner/operator:
- A. Does the owner/operator sign and date the shipping paper? [264.71(b)/265.71(b)] [] []
- B. Note any significant discrepancies in the shipping paper? [264.71(b)(2)/265.71(b)(2)] [] []
- C. Immediately give the rail or water transporter at least one copy of the shipping paper? [264.71(b)(3)/265.71(b)(3)] [] []
- D. Send a signed copy of the shipping paper to the generator within 30 days of the delivery? [264.71(b)(4)/265.71(b)(4)] [] []
- C. Retain a copy of the shipping paper? [264.71(b)(5)/265.71(b)(5)] [] []
- 23 Has the facility received any shipments of waste that were inconsistent with the manifest? [264.72/265.72] [] [X]
- a. If yes, was an attempt made to reconcile the discrepancy with the generator and transporter? [264.72(b)/265.72(b)] [] [] X

	YES	NO	NA
A. If the discrepancy was not reconciled within 15 days, did the owner/operator immediately notify the KDHE? [264.72(b)/265.72(b)]	[]	[]	X
24 Does the owner/operator keep a written operating record at the facility? [264.73(a)/265.73(a)]	[X]	[]	
a. If yes, does the operating record include:			
A. A description and the quantity of each hazardous waste received, and method(s) and date(s) of its treatment, storage, and disposal? [264.73(b)(1)/265.73(b)(1)]	[X]	[]	
B. The location of each hazardous waste within the facility and the quantity at each location? [264.73(b)(2)/265.73(b)(2)]	[X]	[]	
C. Records and results of waste analyses and waste determinations? [264.73(b)(3)/265.73(b)(3)]	[X]	[]	
D. Reports and details of incidents requiring implementation of the contingency plan? [264.73(b)(4)/265.73(b)(4)]	[X]	[]	
E. Records and results of required inspections? [264.73(b)(5)/265.73(b)(5)]	[X]	[]	
F. Monitoring, testing, or analytical data? [264.73(b)(6)/265.73(b)(6)]	[X]	[]	
G. Notices to generators that the facility has the appropriate permit(s) for and will accept the waste the generator is shipping? [264.73(b)(7)/265.73(b)(7)]	[X]	[]	
H. Closure cost estimates (and for disposal facilities, post-closure cost estimates)? [264.73(b)(8)/265.73(b)(8)]	[X]	[]	
I. Certification by the permittee, at least annually, that a hazardous waste minimization program is in place at the facility? [264.73(b)(9)/265.73(b)(9)]	[X]	[]	
J. As applicable, documentation that the Land Disposal Requirements have been met? [264.73(b)(10-16)/265.73(b)(10-16)]	[X]	[]	[]
25 Does the owner/operator prepare and submit a copy of a biennial report to the KDHE by March 1 of each even numbered year? [264.75/265.75]	[X]	[]	
a. If yes, does the report include:			
A. The EPA identification number, name, and address of the facility? [264.75(a)/265.75(a)]	[X]	[]	
B. The calendar year covered by the report? [264.75(b)/265.75(b)]	[X]	[]	
C. A description and the quantity of each hazardous waste received during the year? [264.75(d)/265.75(d)]	[X]	[]	
D. The method of treatment, storage, or disposal for each hazardous waste? [264.75(e)/265.75(e)]	[X]	[]	
E. The most recent cost estimate and, as applicable, the most recent post-closure cost estimate? [264.75(g)/265.75(g)]	[X]	[]	
b. If yes and the facility receives waste from off-site facilities, does the report include:			
A. The EPA identification number of each hazardous waste generator from which the facility received a hazardous waste during the year? [264.75(c)/265.75(c)]	[X]	[]	[]
B. A description and the quantity, listed by the EPA identification number of each generator, of each hazardous waste received during the year? [264.75(d)/265.75(d)]	[X]	[]	[]
c. If yes and the facility receives shipments from foreign generators, does the report include the name and address of the foreign generators?	[]	[]	[X]
d. If yes and the facility is also a generator who treats, stores, and/or disposes of hazardous waste on-site, does the report include a description of:			
A. The efforts undertaken during the year to reduce the volume and toxicity of waste generated? [264.75(h)/265.75(h)]	[]	[]	[X]
B. The changes in volume and toxicity of waste actually achieved during the year in comparison to previous years? [264.75(i)/265.75(i)]		[]	

- 26 Has the facility accepted any waste not accompanied by a manifest or shipping papers? [] [X]
- a. If yes, was the shipment excluded from manifest/shipping paper requirements?
- A. If no, did the facility submit an unmanifested waste report to the KDHE within 15 days? [264.76/265.76] [] []

Manifest System, Recordkeeping and Reporting Requirements:

[X] Compliance [] Non-Compliance [] N/A

Closure and Post-Closure (DCL)

- 27 Does the owner/operator have a written closure plan for the facility? [264.112(a)/265.112(a)] [X] []
- a. If yes, does the plan include:
- A. A description of how and when the facility will be closed? [265.112(b)/265.112(b)] [X] []
- B. A description of the steps necessary to completely close the facility? [264.112(b)(2)/265.112(b)(2)] [X] []
- C. An estimate of the maximum inventory of wastes in storage or in treatment at any give time during the facility life? [264.112(b)(3)/265.112(b)(3)] [X] []
- D. A description of the steps needed to decontaminate facility equipment at the time of closure? [264.112.(b)(4)/265.112(b)(4)] [X] []
- E. A description of the activities necessary to ensure that all closure satisfy the closure performance standards? [265.112(b)(5)/265.112(b)(5)] [X] []
- F. An estimate of the expected year of closure and a schedule for final closure which includes the total time required to close the facility and the time required for intervening closure activities which allow tracking closure progress? [264.112(b)(6)/265.112(b)(6)] [X] []
- 28 Is the facility a disposal facility? [] [X]
- a. If yes, does the owner/operator have a written post-closure plan? [264.118(a)/265.118(a)] [] []
- If yes, does the plan include:
- A. Ground-water monitoring activities and frequencies at which they will be performed? [264.118(c)(1)/265.118(c)(1)] [] []
- B. Maintenance activities and frequencies at which they will be performed to ensure the integrity of the cap and containment structures where applicable, and the function of the monitoring equipment? [264.118(c)(2)/265.118(c)(2)] [] []
- C. The name, address, and phone number of the person or office to contact during the post-closure period? [264.118(c)(3)/265.118(c)(3)] [] []

Closure and Post-closure Requirements:

[X] Compliance [] Non-Compliance [] N/A

Financial Requirements (DFR)

- 29 Does the owner/operator have a written estimate of the closure cost? [264.142(a)/265.142(a)] [X] []
- 30 Has the owner/operator established financial assurance for facility closure and notified the KDHE? [264.143/265.143] [X] []

YES NO NA

- 31 Is the facility a disposal facility? [] [X]
- a. If yes, has the owner/operator:
- A. Established a written estimate of the annual cost of post-closure monitoring and maintenance of the facility? [264.144(a)/265.144(a)] [] []
- B. Established financial assurance for post-closure care and notified the KDHE? [264.145/265.145] [] []
- C. Obtained liability insurance for nonsudden and accident occurrences of at least \$3 million per occurrence with an annual aggregate of at least \$6 million exclusive of legal defense costs? [264.147(b)/265.147(b)] [] []
- 32 Has the owner/operator obtained liability insurance for sudden occurrences of at least \$1 million with an aggregate of at least \$2 million exclusive of legal defense costs? [264.147(a)/265.147(a)] [X] []

Financial Requirements: [X] Compliance [] Non-Compliance [] N/A

Management of Containers (DMC)

- 33 Are containers presently used to store hazardous waste? [X] []
- If yes,
- a. Are the containers in good condition? [264.171/265.171] [X] []
- b. Are the containers compatible with the waste? [264.172/265.172] [X] []
- c. Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste? [264.173/265.173] [X] []
- d. Does owner/operator inspect areas where containers are stored, at least weekly, for signs of leaking containers and for deterioration of the containers and containment system caused by corrosion or other factors? [264.174/265.174] [X] []
- e. Does the storage facility store waste containing free liquids which would require it to have a containment system? [264.174/265.174] [X] []
- If yes,
- A. Is the base free of cracks or gaps and sufficiently impervious to contain leaks, spills, and accumulated precipitation? [264.175(b)(1)/265.175(b)(1)] [X] []
- B. Is the base sloped or the containment system otherwise designed and operated to drain and removed liquids? [264.175(b)(2)/265.175(b)(2)] [X] []
- C. Does the containment system have sufficient capacity to contain 10% of the volume of containers or the volume of the largest container, whichever is greater? [264.175(b)(3)/265.175(b)(3)] [X] []
- D. Is the containment system designed to prevent run-on or to have sufficient excess capacity in addition to that required in item C above? [264.175(b)(4)/265.175(b)(4)] [X] []
- E. Are spilled or leaked waste and accumulated precipitation removed in a timely manner as necessary to prevent overflow of the system? [264.175(b)(5)/265.175(b)(5)] [X] []
- f. Does the storage area store containers holding only wastes that do not contain free liquids? [X] []
- If yes,
- A. Are the containment system requirements of 264.175(b)/265.175(b) met? [X] []
- If no,
- i. Is the storage area sloped or otherwise designed and operated to drain and remove liquid resulting from precipitation? [264.175(c)(1)/265.175(c)(1)]; OR [X] []
- ii. Are the containers elevated or otherwise protected from contact with accumulated liquid? [264.175(c)(2)/265.175(c)(2)] [X] []

YES NO NA

- g. Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line? [264.176/265.176] ☒ YES ☐ NO ☐ NA
- h. If waste in containers is incompatible with other materials stored nearby, in other containers, piles, open tanks, or surface impoundments, are the containers separated from other materials by means of a dike, berm, wall, or other device? [264.177(c)/265.177(c)] ☒ YES ☐ NO ☐ NA

Management of Containers	<input checked="" type="checkbox"/> Compliance	<input type="checkbox"/> Non-Compliance	<input type="checkbox"/> N/A
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TSDLIST: TSD Checklist Revised 9/98

Additional Information and Conclusions:

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
BUREAU OF WASTE MANAGEMENT
1000 SW Jackson, Suite 320
Topeka, Kansas 66612-1366

TANK INSPECTION CHECKLIST
for
EPA and KANSAS GENERATORS

General Tank Information

☒ EPA Generator ☐ Kansas Generator

Tank Number or Name:	V-1	V-2 through V-8, V17 & V-26 (9 tanks)	V-9 through V-16 (11 tanks)
Capacity: (gallons)	7,363	522 to 20,895	2,659 to 9,028
Substance Stored:	10-8-02 to 1-31-03 waste oil; currently not in use	none Empty since fall 1999	none Empty since fall 1999
Waste Code:	D008	n/a	n/a
Location:	Processing Area	Processing Area	Building D
Type: steel, fiberglass, etc.	steel	steel	steel
Vertical or horizontal:	vertical	vertical	horizontal
Type of tank roof:	closed	closed	closed

Applicability

40 CFR 265.190

1. The following tank systems are exempt from 40 CFR 265 Subpart J:
 - (a) Tank systems that are an integral component of a recycling unit.
 - (b) Tank systems that meet the definition of a totally enclosed treatment unit.
 - (c) Tank systems that meet the definition of an elementary neutralization unit.
 - (d) Tank systems that are used exclusively for hazardous waste water treatment under the Clean Water Act.
 - (e) Tank systems that store or treat hazardous waste that contain no free liquids and are located inside a building with an impervious floor are exempt from secondary containment requirements only.
 - (f) Tank systems, including sumps, that serve as part of a secondary containment system.

Existing Tank Systems Requirements - EPA Generator

40 CFR 265.191

- | | | YES | NO |
|----|--|-------------------------------------|-------------------------------------|
| 2. | (a) Is the tank system an existing system, i.e., used for the management of hazardous waste prior to July 14, 1986? If no, skip to 2c. | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| | (b) Does the tank system have secondary containment?
If yes, skip to Question 13 and evaluate containment.
If no, skip to 2h. | <input type="checkbox"/> | <input type="checkbox"/> n/a |
| | (c) Did the generator's waste become a hazardous waste after July 14, 1986? | <input type="checkbox"/> | X |
| | (d) Is the tank system required to have secondary containment under 40 CFR 265.193(a)(5)?
If no, skip to 2f. | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| | (e) Does the tank system have secondary containment?
If yes, skip to Question 3 and evaluate containment as a new tank component.
If no, skip to 2i. | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| | (f) Did the generator obtain and keep on file at the facility a written assessment reviewed and certified by an independent, qualified, registered professional engineer in accordance with 40 CFR 270.11(d), that attests to the tanks system's integrity within 12 months after the date the waste became a hazardous waste? 40 CFR 265.191(a)
If no, skip to 2i. | <input type="checkbox"/> | <input type="checkbox"/> n/a |
| | (A) At a minimum, did the assessment consider the following:
40 CFR 265.191(b) | | |
| | (i) Design standards of the tank and ancillary equipment? | <input type="checkbox"/> | <input type="checkbox"/> |
| | (ii) Hazardous characteristics of the waste? | <input type="checkbox"/> | <input type="checkbox"/> |
| | (iii) Existing corrosion protection? | <input type="checkbox"/> | <input type="checkbox"/> |
| | (iv) Documented age of the tank system, if available? | <input type="checkbox"/> | <input type="checkbox"/> |
| | (v) Results of a leak test, internal inspection, or other tanks integrity examination per 40 CFR 265.191(b)(i) or (ii)? | <input type="checkbox"/> | <input type="checkbox"/> |
| | (g) If the assessment found the tank was leaking or unfit for use, did the generator comply with 40 CFR 265.196?
40 CFR 265.191(d) If yes, skip to Question 13.
If no, skip to 2i. | <input type="checkbox"/> | <input type="checkbox"/> n/a |
| | (h) Does the generator have a variance?
If yes, review variance and skip to Question 15. | <input type="checkbox"/> | <input type="checkbox"/> n/a |
| | (i) The tank system must be emptied and taken out-of-service until secondary containment or a variance is provided. K.S.A. 65-3441(a)(4)
STOP | | |

New Tank System Requirements - EPA Generator

40 CFR 265.192

YES NO

Generators using new tank systems or adding new components must ensure that the foundations, structural supports, seams, connections, and pressure controls (if applicable) are adequately designed and that the tank system has sufficient structural strength, compatibility with the waste to be stored or treated, and corrosion protection so that it will not collapse, rupture, or fail.

3. Has the generator obtained a written assessment reviewed by an independent, qualified, registered professional engineer, who certified in accordance with 40 CFR 270.11(d), attesting to the systems design? 40 CFR 265.192(a) ☒ ☐
4. Did the assessment include, at a minimum, the following information: 40 CFR 265.192(a)
- (a) Design standards for each tank and its ancillary equipment? ☒ ☐
- (b) Hazardous characteristics of the waste to be handled? ☒ ☐
- (c) For an external metal tank shell or metal tank components that will contact soil or water, a determination by a corrosion expert of:
- A. Corrosion factors:
- (i) Soil moisture? ☐ ☐ N/A
- (ii) Soil pH? ☐ ☐ N/A
- (iii) Soil sulfide level? ☐ ☐ N/A
- (iv) Soil resistivity? ☐ ☐ N/A
- (v) Structure to soil potential? ☐ ☐ N/A
- (vi) Influence of nearby underground metal structures? ☐ ☐ N/A
- (vii) Stray electrical currents? ☐ ☐ N/A
- (viii) Existing corrosion protection measures? ☐ ☐ N/A
- B. The type and degree of external corrosion protection needed to ensure the integrity of the tank system, by means of one of the following:
- (i) Corrosion resistant materials, e.g. special alloys or FRP? ☐ ☐ N/A
- (ii) Corrosion resistant coatings with cathodic protection? ☐ ☐ N/A
- (iii) Electrical isolation devices? ☐ ☐ N/A
- (d) For UST's components likely to be affected by vehicular traffic, is there a determination of design or operational measures that will protect the tank system from damage? ☐ ☐ N/A
- (e) Design considerations to ensure any of the following:
- A. Does the tank foundation support the load of a full tank? ☒ ☐
- B. Does the tank system need to be anchored if placed in a saturated zone or seismic fault zone? ☐ ☐ N/A
- C. Will the tank system withstand effects of frost heave? ☐ ☐ N/A
5. The generator must ensure that proper handling procedures were used to install the tank system and prior to covering, enclosing, or placing a new tank system or component in use, an independent, qualified installation inspector or an independent, qualified, registered professional engineer, either of whom is trained and experienced in proper installation of tank systems or components, must inspect

the system for the presence of: 40 CFR 265.192(b)

- | | | |
|--|-------------------------------------|------------------------------|
| (a) Weld breaks? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (b) Punctures? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (c) Scrapes of protective coatings? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (d) Cracks? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (e) Corrosion? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (f) Other structural damage or inadequate construction or installation? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 6. If problems were found, were they repaired before the tank was covered, enclosed, or placed in use? 40 CFR 265.192(b) | <input type="checkbox"/> | <input type="checkbox"/> N/A |
| 7. For UST's, was the system backfilled with noncorrosive, porous, homogeneous material and installed so that the tank and piping were fully and uniformly supported? 40 CFR 265.192(c) | <input type="checkbox"/> | <input type="checkbox"/> N/A |
| 8. Were the tanks and ancillary equipment tested for tightness prior to being covered, enclosed, or placed in use? 40 CFR 265.192(d) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 9. If problems were found, were repairs made prior to being covered, enclosed, or placed in use? 40 CFR 265.192(d) | <input type="checkbox"/> | <input type="checkbox"/> N/A |
| 10. Is all ancillary equipment supported and protected against physical damage and excessive stress due to settlement, vibration, expansion or contraction? 40 CFR 265.192(e) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 11. Did the generator provide the type and degree of corrosion protection specified in the design plans? 40 CFR 265.192(f) | <input type="checkbox"/> | <input type="checkbox"/> N/A |
| (a) If yes, was the installation of the corrosion protection system supervised by an independent corrosion expert? | <input type="checkbox"/> | <input type="checkbox"/> |
| 12. Did the generator obtain and maintain on file at the facility written statements by those persons required to certify the design of the tank system and supervise the installation of the tank system in accordance with the design plans? 40 CFR 265.192(g) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (a) If yes, do the written statements include the certification statement as required in 40 CFR 270.11(d)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

New Tank System Requirements	<input checked="" type="checkbox"/> Compliance	<input type="checkbox"/> Non-Compliance	<input type="checkbox"/> NA
-------------------------------------	--	---	-----------------------------

Containment and Detection Requirements - EPA Generator	40 CFR 265.193
---	-----------------------

- | | YES | NO |
|---|-------------------------------------|--------------------------|
| 13. If the tank is required to have secondary containment, does it meet the following minimum requirements: 40 CFR 265.193(b) and (c) | | |
| (a). Constructed of or lined with materials compatible with the waste and of sufficient strength? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (b). Placed on a structurally adequate foundation or base? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (c). Provided with a leak detection system capable of detecting releases within 24 hours? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (d). Adequately sloped or designed or operated to drain and remove liquids from leaks, spills or precipitation within 24 hours? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

- (e) Does the secondary containment include one of the following:
40 CFR 265.193(d)
- | | | | |
|----|--|-------------------------------------|--------------------------|
| A. | External liner? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| B. | Vault? | <input type="checkbox"/> | <input type="checkbox"/> |
| C. | Double-walled tank? | <input type="checkbox"/> | <input type="checkbox"/> |
| D. | Equivalent device approved by the Secretary? | <input type="checkbox"/> | <input type="checkbox"/> |

- (f) Does the secondary containment satisfy the following requirements: 40 CFR 265.193(e)

For External Liner

- | | | | |
|----|---|-------------------------------------|--------------------------|
| A. | Adequate capacity to contain 100% of the volume of the largest tank within its boundary? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| B. | Designed or operated to prevent run-on or infiltration of precipitation into the containment system unless it has excess capacity to contain a 25-year, 24-hour rain event? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| C. | Free of cracks or gaps? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| D. | Completely surrounds the tank and surrounding earth likely to be exposed to waste if a release occurs? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

For External Liner Constructed of Concrete

- | | | | |
|----|---|-------------------------------------|--------------------------|
| E. | Constructed with chemical-resistant water stops at all joints? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| F. | Provided with an impermeable coating or lining over the concrete? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

For Vaults

- | | | | |
|----|---|--------------------------|--------------------------|
| G. | Adequate capacity to contain 100% of the volume of the largest tank within its boundary? | <input type="checkbox"/> | <input type="checkbox"/> |
| H. | Designed or operated to prevent run-on or infiltration of precipitation into the containment system unless it has excess capacity to contain a 25-year, 24-hour rain event? | <input type="checkbox"/> | <input type="checkbox"/> |
| I. | Constructed with chemical-resistant water stops at all joints? | <input type="checkbox"/> | <input type="checkbox"/> |
| J. | Provided with an impermeable coating or lining over the concrete? | <input type="checkbox"/> | <input type="checkbox"/> |
| K. | Protected against vapor ignition, if required due to ignitable or reactive characteristics? | <input type="checkbox"/> | <input type="checkbox"/> |
| L. | Provided with an exterior moisture barrier or designed and operated to prevent migration of moisture into the vault? | <input type="checkbox"/> | <input type="checkbox"/> |

For Double-Walled Tanks

- | | | | |
|----|--|--------------------------|--------------------------|
| M. | Designed as an integral structure so that outer tank contains any release from inner tank? | <input type="checkbox"/> | <input type="checkbox"/> |
| N. | If metal, the interior of the primary tank and external surface of the outer shell is it protected from corrosion? | <input type="checkbox"/> | <input type="checkbox"/> |
| O. | Provided with a built-in continuous leak detection system capable of detecting releases within 24 hours? | <input type="checkbox"/> | <input type="checkbox"/> |

14. Is ancillary equipment provided with adequate secondary containment, except aboveground piping (exclusive of flanges, valves, and connections), welded flanges, welded joints, welded connections, sealless or magnetic coupling pumps,

sealless valves, pressurized aboveground piping with an automatic shut-off device, any of which when present, are visually inspected daily for leaks?
40 CFR 265.193(f)

☒ ☐

Containment and Detection Requirements ☒ Compliance ☐ Non-Compliance ☐ NA

Operating Requirements - EPA Generator

40 CFR 265.194

- | | | YES | NO |
|-----|--|--------------------------|--------------------------|
| 15. | Is each tank marked with the accumulation start date? K.A.R. 28-31-4(g)(2) | <input type="checkbox"/> | <input type="checkbox"/> |
| | (a) Is each tank emptied at least every 90 days? K.S.A. 65-3441(a)(4) | <input type="checkbox"/> | <input type="checkbox"/> |
| 16. | Is each tank labeled with the words "Hazardous Waste?" K.A.R. 28-31-4(g)(3) | <input type="checkbox"/> | <input type="checkbox"/> |
| 17. | Are hazardous wastes or treatment reagents placed in the tank system that could cause the tank, the ancillary equipment or secondary containment to rupture, leak, corrode, or otherwise fail? 40 CFR 265.194(a) | <input type="checkbox"/> | <input type="checkbox"/> |
| 18. | Does the generator use, at a minimum, the following appropriate controls and practices to prevent spills and overflows: 40 CFR 265.194(b) | | |
| | (a) Spill prevention controls (e.g., check valve, dry disconnects, etc.) | <input type="checkbox"/> | <input type="checkbox"/> |
| | (b) Overfill prevention controls (e.g., high level sensors or alarms, automatic feed cutoff, bypass to standby tank). | <input type="checkbox"/> | <input type="checkbox"/> |
| | (c) Maintenance of freeboard in uncovered tank to prevent overtopping by wave or wind action or precipitation. | <input type="checkbox"/> | <input type="checkbox"/> |

Operating Requirements

☐ Compliance ☐ Non-Compliance ☒ NA

Inspection Requirements - EPA Generator

40 CFR 265.195

- | | | YES | NO |
|-----|--|-------------------------------------|--------------------------|
| 19. | Does the generator inspect, where present, at least once each operating day the following items: 40 CFR 265.195(a) | | |
| | (a) Overfill/spill control equipment (waste-feed cutoff or bypass system) to ensure proper working order? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| | (b) Above-ground portions of the tanks system to detect corrosion or releases? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| | (c) Data from monitoring and leak detection equipment to ensure proper operation? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| | (d) Areas around tank and the secondary containment to detect leaks, etc? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 20. | If the tank has cathodic protection systems, it must be inspected according to the following schedule: 40 CFR 265.195(b) | N/A | |
| | (a) Was proper operation confirmed within 6 months of installation and annually thereafter? | <input type="checkbox"/> | <input type="checkbox"/> |
| | (b) Are impressed current sources inspected/tested at least bimonthly? | <input type="checkbox"/> | <input type="checkbox"/> |
| | (c) Are records maintained of these inspections? | <input type="checkbox"/> | <input type="checkbox"/> |

21. Are all daily inspections documented and kept on file for three years?
K.A.R. 28-31-4(k)

☒ ☐

Inspection Requirements

☒ Compliance ☐ Non-Compliance ☐ NA

Response to Leaks or Spills - EPA Generator

40 CFR 265.196

YES NO

22. If the tank system or secondary containment system had a leak or spill or was determined to be unfit for use, was it immediately removed from service? 40 CFR 265.196

☐ ☐

- (a) If yes, were appropriate follow-up actions taken as required by 40 CFR 265.196(a) through (e), including notifying KDHE of the release within 24 hours?

☐ ☐

23. If extensive repair has been conducted on the tank system, was it recertified by an independent, qualified, registered professional engineer in accordance with 40 CFR 270.11(d) and such certification submitted to the KDHE within 7 days after the tank system was returned to service? 40 CFR 265.196(f)

☐ ☐

Response to Leaks or Spills

☐ Compliance ☐ Non-Compliance ☒ NA

Closure Requirements - EPA Generator

40 CFR 265.197

YES NO

24. If the tank system or part of the tank system has been closed, did the generator remove or decontaminate all waste residues, contaminated containment components, contaminated soils, and contaminated structures and equipment and manage them as hazardous waste? 40 CFR 265.197(a)

☐ ☐

25. If all contaminated soils cannot be practically removed or decontaminated, does the generator provide post-closure care under the landfill requirements of 40 CFR 265.310? 40 CFR 265.197(b)

☐ ☐

Closure Requirements

☐ Compliance ☐ Non-Compliance ☒ NA

Special Requirements for Ignitable and Reactive Waste - EPA Generator 40 CFR 265.198

YES NO

26. With the exception of emergency situations, have ignitable or reactive wastes been placed in any tank by the generator? 40 CFR 265.198

☐ ☒

- (a) If yes, did the generator insure the safety of the operation by one or both of the following methods: 40 CFR 265.198(a)

- A. Was the waste treated immediately before or after being placed in the tank so that it is no longer ignitable or reactive and such treatment is done in compliance with the safety requirements of 40 CFR 265.17(b)?

☐ ☐

B. Was the waste stored or treated under protected conditions eliminating the possibility of ignition or reaction? ☐ ☐

27. If a tank is used to treat or store ignitable or reactive wastes, does the generator meet the National Fire Protection Association's buffer zone requirements for flammable and combustible liquids? 40 CFR 265.198(b) ☐ ☐

Ignitable and Reactive Waste ☐ Compliance ☐ Non-Compliance ☒ NA

Special Requirements for Incompatible Waste - EPA Generator 40 CFR 265.199

- | | YES | NO |
|--|--------------------------|--------------------------|
| 28. If incompatible wastes or incompatible waste and materials are placed in the same tank, is this done under completely controlled and safe conditions as specified in 40 CFR 265.17(b)? 40 CFR 265.199(a) | <input type="checkbox"/> | <input type="checkbox"/> |
| 29. If hazardous waste is placed in a contaminated tank that previously held incompatible waste or materials, did the generator comply with 265.17(b)? 40 CFR 265.199(b) | <input type="checkbox"/> | <input type="checkbox"/> |

Incompatible Waste ☐ Compliance ☐ Non-Compliance ☒ NA

Air Emissions Requirements - EPA Generator 40 CFR 265.202

- | | YES | NO |
|--|--------------------------|--------------------------|
| 30. Any tank system operated by an EPA generator must comply with applicable sections of Subpart AA , BB, and CC. Is the generator subject to: | | |
| (a) 40 CFR 265 Subpart AA? | <input type="checkbox"/> | <input type="checkbox"/> |
| (b) 40 CFR 265 Subpart BB? | <input type="checkbox"/> | <input type="checkbox"/> |
| (c) 40 CFR 265 Subpart CC? | <input type="checkbox"/> | <input type="checkbox"/> |
| If yes to any, complete the appropriate checklists. | | |

Air Emission Requirements ☐ Applicable ☒ Not Applicable
(EPA Generator Stop Here)

HAZARDOUS WASTE TRANSPORTER COMPLIANCE INSPECTION CHECKLIST

Transporter Requirements (TRR)

		YES	No	N/A
1.	Are they registered as a hazardous waste transporter with KDHE? KAR 28-31-6 (b)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	Does transporter comply with the manifest requirements of 40 CFR Part 263.20 except 263.20(h)? KAR 28-31-6(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	Does transporter retain a copy of the manifest for three years? KAR 28-31-6(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.	If they transport hazardous waste subject to the manifest exemption of KAR 28-31-4(d)(7), does the transporter record the following on a log or shipping paper:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a.	The name, address, and EPA ID Number of the generator; KAR 28-31-6(e)(2)(A)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	Quantity of waste shipped? KAR 28-31-6(e)(2)(B)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	DOT shipping information? KAR 28-31-6(e)(2)(C)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	Date the waste was accepted? KAR 28-31-6(e)(2)(D)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	Does the transporter carry this record when transporting the waste to the reclamation facility? KAR 28-31-6(e)(3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f.	Does the transporter retain this record for a period of three years after termination or expiration of the agreement? KAR 28-31-6(e)(4)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Transporter Requirements:

☒ **Compliance**

☐ **Non-Compliance**

☐ **NA**

TRANSPORTER9-9-04.doc Transporter Checklist Revised September 9, 2004

Additional Information and Conclusions:

Other items:

KDHE RCRA Compliance Evaluation Inspection Summary

Clean Harbors Kansas, LLC

2549 N. New York
Wichita, Kansas 67219

EPA ID No.: KSD 007 246 846

Inspection Date: June 19 and 20, 2006

KDHE INSPECTORS: Debbie Travis, SCDO and Akhter Hossain, Bureau of Waste Management, Hazardous Waste Permits.

1.0 INTRODUCTION:

On the above dates a routine inspection was conducted at Clean Harbors Kansas, LLC to determine compliance with state hazardous waste regulations and T/S/D status. The inspection covered points of waste generation, waste storage areas, and included a review of related documents and records. We arrived at the facility at approximately 8:45 a.m. and met with Brian Key, TS General Manager Plain States Region.

The permit for this facility expired on April 7, 2005. However, since the Kansas Department of Health and Environment (KDHE) received a renewal application dated October 8, 2004, the permit and all permit conditions remain in effect until a new permit is issued. Akhter Hossain, Ph.D., P.E. is the contact person with the Bureau of Waste Management (BWM), Hazardous Waste Permit Section.

2.0 CHANGES SINCE PREVIOUS INSPECTION:

All of the employees at the site are in the Clean Harbors Field Services Division. There is no division between site personnel and field services personnel. Mr. Key informed me that currently the facility is primarily a 10-day transfer facility (truck to truck). The only waste that might be stored over ten days could be waste generated on site.

Debbie Travis conducted the last inspection on August 11, 2005. Two violations were cited and corrected: K.A.R. 28-31-4(g)(2) was cited for failure to mark or label a storage drum with an accumulation start date and Permit Part I, Section III. E. [40CFR264, subpart I) was cited for failure to manage a storage container properly.

Debbie Travis and Steff Fackrell previously inspected this facility in September 2003. Twelve violations were cited and corrected: failure to determine if the liquid or the materials are hazardous, failure to maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned, sudden or non-sudden release of hazardous waste constituents to the air, soil, or surface water which could threaten human health or the environment, failure to document the required information on 45 inspection logs, failure to provide hazardous waste training, failure to provide copies of the Contingency Plan to outside agencies, failure to update the emergency coordinator

documented in the Contingency Plan, failure to have a trained emergency coordinator available at all times in case of an emergency, failure to comply with the following manifest requirements, failure to manage incompatible wastes in accordance with the procedures in Special Requirements for Incompatible Wastes, failure to properly handle a hazardous waste storage container that is not in good condition, failure to inspect tank V-1 on 11/2/02 and 11/3/02, and failure to maintain the roof of building D and adequate TSD staffing.

Debbie Travis conducted an inspection of this facility (Safety Kleen) on June 2002. Nine violations were cited and corrected: two open satellite drums, one unlabeled satellite drum, one storage drum not in good condition, two storage containers with no accumulation start date, two drums with improper accumulation start dates, failure to maintain the roof on buildings (B, J, I, & D), 138 violations on the daily and weekly inspection logs, failure to provide 61 daily inspection logs, and failure to file a notice with the Secretary of KDHE for exporting hazardous waste to a foreign source five times. A Consent Agreement and Final Order was signed on March 11, 2005.

3.0 INSPECTION:

Mr. Key accompanied us on the inspection of the facility. Refer to attachment 1 for the facility site map. The facility consist of buildings A, B, C, D, E, H, I, J, K, an inoperable processing area and the drum dock area. Many of the buildings were empty, but they all contained the required safety equipment. BWM Permitting granted Clean Harbors request to deactivate buildings B, D, I, and J (attachment 2). Deactivation of the buildings began on January 3, 2006. These buildings will no longer be used by the facility without a 60-day notification to KDHE. Daily inspections will cease but weekly inspections are still required for these building. The weekly inspections will confirm that no waste is in the buildings. Per an e-mail (attachment 2) Clean Harbors requested authorization to drain the fire suppression systems and turn off the heat in buildings J and I. Per discussions with Mr. Key they decided not to implement the request referred to above.

Building A

This building is currently storing office equipment.

Building B

This building is currently empty and deactivated (photographs 1 and 2).

Building C

The building is permitted to store ignitable and non-ignitable hazardous waste. This building is currently storing, empty drums, packing material, and one drum of hazardous waste.

Next to the south wall we observed two roll-off trash bins (photograph 3). Mr. Key told us the non-hazardous solid waste generated by the facility is stored in these bins for approximately 3 to 4 months. When the bins are almost full they contact Waste Management for disposal. Waste Management dumps these bins into a 24 cubic yard

roll-off container. The last disposal occurred on March 2, 2006 (attachment 3). Within the trash bin labeled "Dumpy" we observed the following items:

- Brown floor dry sweepings, which appear to have been used for cleaning up an unknown material (photographs 4 and 5).
- Blue plastic gloves are intermixed with the floor sweepings (photographs 4 and 5). There were no visible stains on the gloves.
- The light green absorbent pad was within a plastic bag, which was inside the trash bin. The pad is contaminated with a brownish black unknown material (photographs 6 and 7). The size of the pad is approximately 24"x24".
- The white Tyvek suit is within the same plastic bag as the light green absorbent pad. The suit is contaminated with a yellow unknown material. (photographs 8 and 9).

Mr. Key told us all of these items are routinely managed as hazardous waste. These wastes are shipped out as hazardous waste, refer to manifest 00509, line 11.a. (attachment 4). He did not know why the wastes were in this trash bin. After a discussion with Nathan Embery, Truck-to-Truck (TTT) Supervisor, he told us since the Tyvek suit, and absorbent pad were within a plastic bag, most likely a Field Chemist did not separate their waste when they returned to the facility. Clean Harbors procedure is when the Field Chemist returns to the facility they are to separate the non-hazardous waste from the hazardous waste that was generated during the day and handle each waste stream appropriately. He had no knowledge about the floor dry sweepings.

Violation 2, K.S.A. 65-3441(a)(4) was cited for illegal disposal of hazardous waste.

Building D

This building is currently empty and deactivated (photographs 10 and 11). There are eleven horizontal storage tanks mounted from the ceiling. The tanks have been cut open and are not currently in use.

Building E

This building houses the administrative offices for the facility.

Building H

This building houses the laboratory. We observed a closed and labeled satellite container of solid hazardous waste.

Building I

This building is currently empty and deactivated (photographs 12 and 13). We observed water on the floor. Mr. Key told us the roof has a small leak.

Building J

This building is currently empty and deactivated (photographs 14 and 15).

Building K

This building is currently storing office equipment. The building is a non-permitted building.

Processing Area

The processing area is currently not in operation. Within the processing area there are ten storage tanks and an inoperable drum-cleaning unit.

Drum Dock Area

The 10-day storage drums are managed in this area. A metal awning attached to Building (C) covers the area (photograph 16). We observed one labeled and closed satellite drum containing solid hazardous waste.

4.0 Record Review:

I reviewed the biennial report, contingency plan, personnel training documents, manifests, LDR's, and weekly and daily inspection logs from August 11, 2005 through June 19, 2006. Clean Harbors has a computer generated bar code and numbering system. Every container is labeled with a bar code for tracking.

Violation 1, Permit Section II.F. / 40CFR 265.16 / 40CFR264.16 was cited for failure to comply with personnel training per the permit. Refer to the Permit Part I, Section II.F. – *Personnel Training* (attachment 5) and Refer to the RCRA Permit Application, Section I-*Training Program* (attachment 6). Hazardous waste training was not conducted for over 15 months for Brian Key, Nathan Embery, and Karyn Hetherington, Technical Service Coordinator. During this timeframe Mr. Key was listed as the emergency coordinator (attachment 7) and Mr. Embery (attachment 8) and Ms. Hetherington (attachment 9) conducted daily and weekly inspections. Attachment 8 and 9 are examples of multiple inspections conducted by Mr. Embery and Ms. Hetherington. Mr. Key, Mr. Embery and Ms. Hetherington received training on October 11, 2004 (attachment 10). Mr. Key and Mr. Embery received hazardous waste training on June 12, 2006 (attachment 11). Ms. Hetherington's hazardous waste training is scheduled for June 22, 2006.

5.0 Exit Briefing:

On June 20, 2006, I returned to Clean Harbors to conduct the exit briefing with Mr. Key. David Nielson, Director Landfill Compliance attended the exit meeting via telephone. I explained the violations and the corrective actions. Additionally, we discussed the following concerns and comments:

- A. Re-train Field Chemist on how to handle hazardous waste generated in the field.

Refer to attachment 12 for the documents given to Mr. Key.

6.0 ATTACHMENTS:

1. Facility Site Map
2. Deactivation of Buildings E-mails (3 pages)
3. Waste Management Invoice, dated 3/16/06 (2 pages)
4. Manifest 00509
5. Permit Part I, Section II.F. – *Personnel Training*
6. RCRA Permit Application, Section I-*Training Program* (2 pages)
7. Table H-1 Emergency Response Coordinators, dated 4/23/04
8. Monthly Inspection Log, dated 6/7/06 (6 pages)
9. Daily Inspection Log, dated 1/20/06 (6 pages)
10. Training Documentation, dated 10/11/04
11. Training Documentation, dated 6/12/06
12. Documentation Log, dated 7/20/06

7.0 APPENDIX:

7.0 APPENDIX:
Debbie Travis took all photographs with a Sony Cyber-Shot digital camera

8.0 SIGNATURE OF AUTHOR/INSPECTOR:

Debbie Travis prepared this report:

Debbie Train 7/28/06
Signature Date

ATTACHMENTS

EMBERY, NATHANIEL G

From: STEWART, LON R
Sent: Tuesday, April 11, 2006 3:40 PM
To: EMBERY, NATHANIEL G; Key, Charles B; NIELSEN, DAVID B
Subject: FW: Clean Harbors Wichita - Deactivation of Buildings B, D, I and J

Nate, I believe this will be your official notice that it is "OK" to deactivate the 4 storage buildings. Please print a copy of this email and place it in the files, actually put a copy in the inspection record and with the Part B Permit for easy reference showing we have proof for deactivating these areas. Also not that it will need 60 days of prior notice and a KDHE inspection before we can start using the areas again, so some planning will be required once corporate wants to bring the areas back on line.

Lon

-----Original Message-----

From: MKamal@kdhe.state.ks.us [mailto:MKamal@kdhe.state.ks.us]
Sent: Mon 4/10/2006 4:12 PM
To: STEWART, LON R
Cc: SHowell@kdhe.state.ks.us; AHossain@kdhe.state.ks.us
Subject: Clean Harbors Wichita - Deactivation of Buildings B, D, I and J

Dear Mr. Stewart,

Sorry for the delay in responding to your request. I have verified your permitting requirements with Shawn Howell of my staff regarding any possible noncompliance issues arising from deactivating the buildings B, D, I and J on November 29, 2005. We agree that your plan of action as depicted in the enclosed email will provide adequate protection of human health and the environment and we feel you will be in compliance with your RCRA permit requirements. Nevertheless, KDHE requests that you provide us with at least a 60-day notification prior to putting these storage areas back in operation. Hazardous waste permits staff will perform inspections before re-authorizing storage in these areas.

Should you have any questions, please feel free to call me.

Mostafa Kamal, PE, CPM
Chief, Hazardous Waste Permits Section
Phone: 785-296-1609
Fax: 785-296-1592
email: mkamal@kdhe.state.ks.us

"STEWART, LON R"
<stewart.lon@clea
nharbors.com>
To
<mkamal@kdhe.state.ks.us>
03/30/2006 04:11
PM cc

Subject
FW: Clean Harbors Wichita

> -----Original Message-----

> From: STEWART, LON R
> Sent: Tuesday, March 28, 2006 11:14 AM
> To: 'showell@kdhe.state.ks.us'
> Subject: Clean Harbors Wichita

>

> Shawn,

> As per our phone conversation today, I would like to have a written confirmation of the verbal decision granted on November 29, 2005 to deactivate buildings B, D, I and J at the Clean Harbors Kansas, LLC facility.

>

> As per our agreement in November, as conditions of deactivation, no waste will be stored in any of the 4 buildings while it is decommissioned and it will be locked or secured from unauthorized entry. Clean Harbors will perform weekly inspections of these 4 buildings to confirm that no waste is in the buildings. The inspections are not designed to inspect the physical condition of the buildings for RCRA standards. The buildings will be brought up to RCRA standards prior to being used again for storage of hazardous wastes.

>

> These changes were instituted following our phone conversation on November 29, 2005.

>

> Thank you for your followup on this matter. I can be reached at 602-462-2315 if you need discuss this further,

>

> Lon Stewart

ATTACHMENT 2 Page 2 of 3

5/9/2006

EMBERY, NATHANIEL G

From: STEWART, LON R
Sent: Tuesday, November 29, 2005 12:16 PM
To: EMBERY, NATHANIEL G; NOBLE, JAMES M; Key, Charles B; Foley, Michael A; NIELSEN, DAVID B
Subject: Wichita Inspections

I have recieved a verbal approval from Shawn Howell, permit writer for KDHE, to deactivate buildings B, D, I and J at Wicnita. We have agreed that it is OK to drain the fire suppression system in buildings I and J and turn off the heat. I have notified Sean McFaul in Risk Managment at corporate. I have not contacted the Wichita Fire Dept.

The agreement KDHE and I came up with was that no waste will be stored in any of the 4 buildings while it is decommissioned (mothballed) and it will be locked or secured from unauthorized entry (bldg B & D are behind the security fence). We will perform weekly (instead of daily) inspections of these 4 bulidings to confirm that no waste is in the buildings. The daily inspection reports for the 4 buildings will have the words "day " and "daily" changed to "week and "Weekly" to correspond with this change. The buildiiings will be brought up to RCRA standards prior to being used again for storage of hazardous wastes (fire system activated, containment repaired or repainted if needed, etc.). These changes can be instituted immediately.

This is all verbal at this point in time, the final letter of approval from KDHE may contain some other stipulations not discussed. I will distribute the approval letter when I recieve it.

Lon
602-462-2315

WASTE MANAGEMENT
WASTE MANAGEMENT OF WICHITA
4330 W 31ST ST S
WICHITA KS 67215-1005

(316) 945-3900
(316) 945-5524 FAX

INVOICE

GROUP 1169
VOUCHER 1222

APR 04 2006

Customer: CLEAN HARBORS ENVIRONMENTAL
Account Number: 235-0098569-2738-0
Invoice Date: 03/16/2006
Invoice Number: 2610780-2738-8
Due Date: Due Upon Receipt
WM ezPay Account ID: 00006-66790-83005

Current Invoice Amount	Total Amount Due
219.11	219.11

Account Summary	
Account Level PO# 696	
Description	Amount
Previous Balance	0.00
Total Credits and Adjustments	0.00
Total Payments Received	0.00
Total Current Charges	219.11
Total Amount Due	219.11
Total Amount Past Due	0.00
Service Period: MARCH PULLS	

Description	Amount
Roll-Off	219.11
Total Current Charges	219.11

Please pay total amount due. Thank you for your business.
PO# 696 Vendor ID# 46731
G/L Code: 6145-6744 #:
Amount to be paid: 219.11
Less than full invoice amount Vendor
authorization #:
Kay Hetherington 4/4/06
(approval signature) (date)
Kay Hetherington
(print name)

***** PLEASE NOTE ***** Payments are not processed at the local Waste Management office. Please submit all payments to the Louisville Kentucky address."

If full payment of the invoiced amount is not received within 30 days of the invoice date, you will be charged a monthly late fee of 1.5% of the unpaid amount, with a minimum monthly charge of \$3.00, or such lesser late fee allowed under applicable law, regulation or contract.

Want to pay this bill on-line? Go to www.wm.com to learn more about WMezPay and make a convenient, secure payment.

Current Due	Over 30	Over 60	Over 90	Over 120	Total Due
219.11	0.00	0.00	0.00	0.00	219.11

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clean.

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Think Green® Think Waste Management.

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WASTE MANAGEMENT
WASTE MANAGEMENT OF WICHITA
4330 W 31ST ST S
WICHITA KS 67215-1005

(316) 945-3900
(316) 945-5524 FAX

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www.wm.com/thinkgreen

Payment Coupon

Please detach and enclose this portion with your payment - do not send cash.

Payment Coupon		Your Account Number	
<i>Please detach and enclose this portion with your payment - do not send cash.</i>		235-0098569-2738-0	
Invoice Date		Your Invoice Number	
03/16/2006		2610780-2738-8	
Due Date	Total Due	Amount Paid	
Upon Receipt	219.11		

Waste Management introduces WM ezPay!! Pay your WM bill on-line at www.wm.com.

Paying by credit card? Please fill out the reverse side of the Payment Coupon.

27382350098569026107800000002191100000021911 9

0000673 01 AT 0.308 **AUTO T4 3 5575 67219-432249 CP2 I0516010

CLEAN HARBORS ENVIRONMENTAL
2549 NEW YORK
WICHITA KS 67219-4322

Please make
Check
Payable To: WASTE MANAGEMENT OF WICHITA
PO BOX 9001054
LOUISVILLE KY 40290-1054

ATTACHMENT 3 Page 1 of 2

Customer: CLEAN HARBORS ENVIRONMENTAL
 Account Number: 235-0098569-2738-0
 Invoice Date: 03/16/2006
 Invoice Number: 2610780-2738-8
 Due Date: Due Upon Receipt
 WM ezPay Account ID: 00006-66790-83005

MANAGEMENT
 MANAGEMENT OF WICHITA
 ST ST S
 KS 67215-1005

Service Location: 235-98569 Clean Harbors Environmental: 2549 New York: Wichita Ks 67219-4322

	Ticket	Description	Quantity	U/M	Rate	Amount
02/06	287859	24 Yd rolloff	1.00			199.00
		Flat 1.38 Final job #p o #696				
03/16/06		1.00 Fuel/environmental surcharge	1.00			20.11
Total Current Charges						219.11

ATTACHMENT 3 Page 2 of 2

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. K S D 0 0 7 2 4 8 8 4 6	Manifest Document No. 0 0 5 0 9	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.						
3. Generator's Name and Mailing Address Clean Harbors Kansas LLC 2548 North New York Street Wichita, KS 67219				A. State Manifest Document Number							
4. Generator's Phone (316) 269-7400				B. State Generator's ID SAME							
5. Transporter 1 Company Name Smith Systems Transportation				C. State Transporter's ID (800) 884-2597							
6. US EPA ID Number N E D 9 8 6 3 8 2 1 3 3				D. Transporter's Phone							
7. Transporter 2 Company Name				E. State Transporter's ID							
8. US EPA ID Number				F. Transporter's Phone							
9. Designated Facility Name and Site Address Clean Harbors Env Services Inc 2247 South Highway 71 Kimball, NE, 69145				G. State Facility's ID							
10. US EPA ID Number N E D 9 8 1 7 2 3 5 1 3				H. Facility's Phone (308) 235-4012							
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.						
a.	RM X RQ, WASTE FLAMMABLE SOLIDS, TOXIC, ORGANIC, N.O.S., (CONTAMINATED PPE AND DEBRIS), 4.1, (6.1), UN2926, PG II (D001)	0 0 1 D M	0 2 0 0	P	D001 D004 D005 D006 D007 D008 D004 D005						
b.	X RQ, HAZARDOUS WASTE, LIQUID, N.O.S., (CONTAMINATED SUMP WATER), 9, NA3082, PG III (D004)	0 2 1 D M	8 4 0 0	P	D006 D007 D008 D009						
c.											
d.											
J. Additional Descriptions for Materials Listed Above 11a. ERG#134 (S),(E) 11b. ERG#171 (S),(E)		<table border="1"> <tr> <td>CR</td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>FS</td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>OFFC</td> <td><input type="checkbox"/></td> </tr> </table>		CR	<input checked="" type="checkbox"/>	FS	<input checked="" type="checkbox"/>	OFFC	<input type="checkbox"/>	K. Handling Codes for Wastes Listed Above	
CR	<input checked="" type="checkbox"/>										
FS	<input checked="" type="checkbox"/>										
OFFC	<input type="checkbox"/>										
15. Special Handling Instructions and Additional Information 11a. FB5-inter D009 D010 D011 D018 D019 D020 D021 D022 D023 D024 D025 D026 D027 D028 D029 D035 D039 D040 F001 F002 F003 F004 F005 11b. A22k-inter D010 D011 D018 D019 D020 D021 D022 D023 D024 D025 D026 D027 D028 D029 D035 D039 D040 F001 F002 F003 F004 F005											
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.											
Printed/Typed Name Nathanial Embery		Signature 		Month Day Year 10/6/2016							
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Derrek Barnes		Signature 		Month Day Year 10/6/2016							
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year							
19. Discrepancy Indication Space											
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Christopher Link											
Signature 		Month Day Year 10/6/2016									



II.D. SECURITY

The Permittee shall comply with the security provisions of 40 CFR 264.14(b)(2) and (c) and the Facility Security - Section B-5 of the Part B permit application.

The Permittee must prevent the unknowing entry, and minimize the possibility for the unauthorized entry, of persons or livestock onto the active portions of this facility. An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry through gates or other entrances to the facility must be maintained at all times.

In addition, the Permittee must post signs bearing the legend "Danger - Unauthorized Personnel Keep Out" and "No Smoking" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the facility. This legend must be written in English and must be legible from a distance of at least 25 feet.

The Permittee will advise the Department if unauthorized entry occurs at the facility which causes hazardous waste to be discharged, the nature of problems, if any, that resulted from this occurrence and the corrective action taken by the facility to prevent future happenings. This includes any tampering, destruction, or loss at the facility which causes a release of hazardous waste.

II.E. GENERAL INSPECTION REQUIREMENTS

The Permittee shall comply with the inspection requirements of 40 CFR 264.15, 264.174, and 264.195. The Permittee shall follow the inspection schedule set out in Inspection Schedule - Section F-3 of the Part B permit application. The Permittee shall remedy any deterioration or malfunction discovered by an inspection, as required by 40 CFR 264.15(c). Records of inspection shall be kept on-site, as required by 40 CFR 264.15(d).

II.F. PERSONNEL TRAINING

The Permittee shall conduct personnel training, as required by 40 CFR 264.16. This training shall follow the Training Program - Section I-1 and I-2 of the Part B permit application. The Permittee shall maintain training documents and records, as required by 40 CFR 264.16(d) and (e).

II.G. SPECIAL PROVISIONS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE

The Permittee shall comply with the requirements of 40 CFR 264.17(a). The Permittee shall follow the procedures for handling ignitable, reactive, and incompatible wastes set forth in: 1) General Container Management Practices - Section D-3, 2) Operational Practices - Section E-3, and 3) Prevention of Reaction of Ignitable, Reactive and Incompatible Wastes - Section G-6 of the Part B permit application respectively.

Clean Harbors Kansas, LLC
RCRA Permit Application
Section I
Training Program

I-1b Training Content, Frequency and Techniques: 40 CFR
264.16(a)(3), 264.16(c) and 264.16(d)(3)

Initial training of facility employees will consist of:

- . 24 hours of safety training as described by 29 CFR 1910.120(p)(7), for operations personnel,
- . an introductory training seminar, and
- . job specific training.

Each employee must complete the introductory training seminar prior to working without direct supervision in any hazardous waste management area at the facility. The introductory training seminar will last approximately sixteen (16) hours. The topics covered during this seminar include facility specific items such as the Contingency/Emergency Plan, as well as basic training in general topics such as chemistry and occupational safety. An outline of the seminar is provided in Appendix I-B, Introductory Training Seminar Outline. After completion of the introductory training seminar, the employees will be tested to evaluate their comprehension of the information presented. An example of the type of test employees may be given is provided in Appendix I-C,

Clean Harbors Kansas, LLC
RCRA Permit Application
Section I
Training Program

Example Introductory Training Seminar Test.

In addition to the introductory training seminar, employees will be provided with job-specific training such as on-the-job training. The type and content of the job-specific training will depend on the skills and level of expertise demanded by the job.

Appendix I-D, Typical Job-Specific Training Topics includes a list of typical topics for job-specific training that will be provided to the appropriate employees. The job-specific training completes the employee's initial training. Employees will not be allowed to perform unsupervised, hazardous waste management duties prior to completion of initial training.

Continuing training will be provided for employees performing certain jobs after the employee completes the initial training.

At a minimum, the continuing training will consist of an annual review of the introductory training seminar.

Training techniques will vary depending on the subject.

Typically, training techniques may involve classroom lecture, on-the-job, and audio/visual demonstration. Training instructors

TABLE H-1

Emergency Response Coordinators

Primary Emergency Response Coordinator

Brian Key

Work: 316-269-7400

Ex. 6 PII

Alternate Emergency Response Coordinator

Matt Noble

Work: 316-269-7400

Clean Harbors
~~SAFETY~~ ~~KLEEN~~ (WICHITA)
 MONTHLY INSPECTION LOG

FOR THE MONTH OF : June , 2000

6/7
 DATE AND TIME: 1200

INSPECTION UNIT	PERIMETER AND GENERAL FACILITY		
INSPECTION ITEM	ELEMENT	STATUS	OBSERVATION/ REMEDIAL WORK ORDERS ISSUED
Facility Gates	Operate and make sure the warning signs are present and visible.	A / U	
Fences	Check for breaks or damage.	A / U	
	Check for erosion under fences.	A / U	
Access Roads	Check for facility debris, deterioration, and spills.	A / U	
Perimeter and Yards	Note any evidence of stressed vegetation or vegetation obscuring signs.	A / U	
Loud Speakers	Check for operability and clarity. Receive confirmation of both.	A / U	
Telephone System, Emergency Alarm	Check for operability and verify contingency plan contact list is present.	A / U	

INSPECTION UNIT/ AREA: G BUILDING: Break Room and Showers			
INSPECTION ITEM	ELEMENT	STATUS	OBSERVATION/ REMEDIAL WORK ORDERS ISSUED
Emergency Equipment	Check SCBA for cleanliness, air, operability.	A / U	
	Check first aid kit for stock and accessibility.	A / U	

ATTACHMENT 8 Page 1 of 6

INSPECTION COMPLETED BY: 

***** DEFICIENCIES AND CORRECTIONS ARE DETAILED IN THE REFERENCED WORK ORDERS *****

1 *Clean Harbors*
~~SAFETY KLEEN~~ (WICHITA)
 MONTHLY INSPECTION LOG

FOR THE MONTH OF : June , 2006

DATE AND TIME: 6/7 1230

INSPECTION UNIT	BUILDING D:		
INSPECTION ITEM	ELEMENT	STATUS	OBSERVATION/ REMEDIAL WORK ORDERS ISSUED
Telephone System, Emergency Alarm	Check for operability and verify contingency plan contact list is present.	(A) U	
Spill Control Equipment	Check inventory and availability of absorbent, shovel, broom, and drum.	(A) / U	
PPE Storage	Inspect inventory for adequate supplies and operable condition.	A / U	No longer stored here
Fire Extinguishers	Check seals and pressure. Assure that appropriate type is hanging by signs/ contingency plan.	(A) / U	

ATTACHMENT 8 Page 2 of 6

INSPECTION COMPLETED BY: 

***** DEFICIENCIES AND CORRECTIONS ARE DETAILED IN THE REFERENCED WORK ORDERS *****

Clean Harbors
~~SAFETY~~ ~~KLEEN~~ (WICHITA)
 MONTHLY INSPECTION LOG

FOR THE MONTH OF : June , 2006

DATE AND TIME: 6/7 1245

INSPECTION UNIT	PROCESSING AREA:		
INSPECTION ITEM	ELEMENT	STATUS	OBSERVATION/ REMEDIAL WORK ORDERS ISSUED
Light Liquid Pumps	Visually check all pumps, valves, flanges, pressure relief devices, and connections for evidence of leaks.	<u>A</u> / U	
	Check that monthly AA BB monitoring has been performed and recorded.	A / <u>U</u>	<u>Not in use</u>
Spill Control Equipment	Check for inventory and availability of absorbent, shovel, broom, and drum.	<u>A</u> / U	
Emergency Equipment	Check for cleanliness, proper location of contingency plan equipment, and operability of eyewash and shower stations.	<u>A</u> / U	
Fire Extinguishers	Check for seals and pressure. Assure that correct type is hanging by signs/ contingency plan.	<u>A</u> / U	
Warning Signs	Check that No Smoking Signs are visible on all four sides of the Processing building.	<u>A</u> / U	
Fire Suppression System	Check for deterioration.	<u>A</u> / U	

ATTACHMENT 8 Page 3 of 6

INSPECTION COMPLETED BY: 

***** DEFICIENCIES AND CORRECTIONS ARE DETAILED IN THE REFERENCED WORK ORDERS *****

Clean Harbors
~~SAFETY~~ ~~KLEEN~~ (WICHITA)
 MONTHLY INSPECTION LOG

FOR THE MONTH OF : June , 2006

DATE AND TIME: 6/7 1315

INSPECTION UNIT/ AREA: H BUILDING: Operations Shack			
INSPECTION ITEM	ELEMENT	STATUS	OBSERVATION/ REMEDIAL WORK ORDERS ISSUED
Emergency Equipment	Check for stock and accessibility of First Aid kit.	A / U	
Fire Extinguisher	Check for seals and pressure. Assure that correct type is hanging by signs/ contingency plan.	A / U	
Telephone System, Emergency Alarm	Check for operability and verify contingency plan contact list are present.	A / U	

INSPECTION UNIT BUILDING C:			
INSPECTION ITEM	ELEMENT	STATUS	OBSERVATION/ REMEDIAL WORK ORDERS ISSUED
Spill Control Equipment	Check for inventory and availability of absorbent, shovel, broom, and drum.	A / U	
Fire Extinguishers	Check for seals and pressure. Assure that correct type is hanging by signs per contingency plan.	A / U	
Telephone System, Emergency Alarm	Check for operability and verify Contingency Plan Contact List is present.	A / U	
Fire Suppression System	Check pressure gauges: water approx. 100PSI, air approx. 40-45PSI.	A / U	

INSPECTION UNIT Drum Dock:			
INSPECTION ITEM	ELEMENT	STATUS	OBSERVATION/ REMEDIAL WORK ORDERS ISSUED
Telephone System, Emergency Alarm	Check for operability and verify contingency plan contact list is present.	A / U	

ATTACHMENT 8 Page 4 of 6

INSPECTION COMPLETED BY: 

***** DEFICIENCIES AND CORRECTIONS ARE DETAILED IN THE REFERENCED WORK ORDERS *****

Clean Harbors
~~SAFETY~~ ~~KLEEN~~ (WICHITA)
 MONTHLY INSPECTION LOG

FOR THE MONTH OF : June , 2006

DATE AND TIME: 6/7 1345

INSPECTION UNIT	WEST YARD		
INSPECTION ITEM	ELEMENT	STATUS	OBSERVATION/ REMEDIAL WORK ORDERS ISSUED
Facility Gates	Check: should be locked, and warning signs present and visible.	A / U	
Access Roads	Check for facility debris, deterioration, and spills.	A / U	
Fences	Check for breaks or damage.	A / U	
	Check for erosion under fences.	A / U	
Perimeter and Yards	Note any evidence of stressed vegetation.	A / U	
INSPECTION UNIT	BUILDING B:		
INSPECTION ITEM	ELEMENT	STATUS	OBSERVATION/ REMEDIAL WORK ORDERS ISSUED
Spill Control Equipment	Check for inventory of absorbent, soda ash, shovel, broom, and poly drum.	A / U	
Telephone System, Emergency Alarm	Check for operability and verify contingency plan contact list is present.	A / U	
Fire Extinguishers	Check seal and pressure. Assure appropriate type is hanging by sign/ contingency plan.	A / U	
INSPECTION UNIT/ AREA: A BUILDING: Laboratory			
INSPECTION ITEM	ELEMENT	STATUS	OBSERVATION/ REMEDIAL WORK ORDERS ISSUED
Emergency equipment	Check eyewash and shower stations for cleanliness, and accessibility.	A / U	
Fire Extinguishers	Check seal and pressure. Assure appropriate type is hanging by sign/ contingency plan.	A / U	No longer a lab

ATTACHMENT 8 Page 5 of 6

INSPECTION COMPLETED BY: 

***** DEFICIENCIES AND CORRECTIONS ARE DETAILED IN THE REFERENCED WORK ORDERS *****

Clean Harbors
SAFETY - KLEEN (WICHITA)
MONTHLY INSPECTION LOG

FOR THE MONTH OF : June , 2006

DATE AND TIME: 6/7 1130

INSPECTION UNIT	WEST YARD		
INSPECTION ITEM	ELEMENT	STATUS	OBSERVATION/ REMEDIAL WORK ORDERS ISSUED
Telephone System, Emergency Alarm	Check for operability and verify contingency plan contact list is present.	<u>A</u> / <u>U</u>	
INSPECTION UNIT	BUILDING I		
INSPECTION ITEM	ELEMENT	STATUS	OBSERVATION/ REMEDIAL WORK ORDERS ISSUED
Gates & Doors	Operate and make sure the warning signs are present and visible. Gates and doors should be locked unless in use.	<u>A</u> / <u>U</u>	
Fire Extinguishers	Check seal and pressure. Assure appropriate type is hanging by sign/ contingency plan.	<u>A</u> / <u>U</u>	
Access Roads and Yards	Check for facility debris, deterioration, and spills.	<u>A</u> / <u>U</u>	

INSPECTION UNIT	BUILDING J		
INSPECTION ITEM	ELEMENT	STATUS	OBSERVATION/ REMEDIAL WORK ORDERS ISSUED
Gates & Doors	Operate and make sure the warning signs are present and visible. Gates and doors should be locked unless in use.	<u>A</u> / <u>U</u>	
Fire Extinguishers	Check seal and pressure. Assure appropriate type is hanging by sign/ contingency plan.	<u>A</u> / <u>U</u>	
Access Roads and Yards	Check for facility debris, deterioration, and spills.	<u>A</u> / <u>U</u>	

CLEAN HARBORS, KANSAS, L.L.C.
DAILY INSPECTION LOG

FOR THE DAY OF January 20, 2006

TIME: 2:30pm

INSPECTION UNIT	PERIMETER AND YARDS		
INSPECTION ITEM	ELEMENT	STATUS	OBSERVATION/ REMEDIAL WORK ORDERS ISSUED
Facility Gates	Check: should be locked, and warning signs present and visible.	(A) / U	
Access Roads	Check for facility debris, deterioration, and spills.	(A) / U	
Perimeter and Yards	Check for contaminated pallets, hoses, equipment or debris, or evidence of spills.	(A) / U	

INSPECTION COMPLETED BY: Kayne Heltz

***** DEFICIENCIES AND CORRECTIONS ARE DETAILED IN THE REFERENCED REMEDIAL WORK ORDERS *****

CLEAN HARBORS, KANSAS, L.L.C.
DAILY INSPECTION LOG

FOR THE DAY OF January 20, 2006

TIME: 2:35pm

INSPECTION UNIT	PROCESSING AREA:		
INSPECTION ITEM	ELEMENT	STATUS	OBSERVATION/ REMEDIAL WORK ORDERS ISSUED
Container Storage, Ignitable Storage, Containment	Two foot minimum aisle space between piles of drums.	A / U	No Drums
	Loading/unloading areas: check for evidence of spills or accumulated liquids.	A / U	Present
	Cracks or general deterioration of the concrete.	(A) / U	
	Coating integrity: check for cracks, gaps, flaking, chips, gouges, or other signs of wear.	(A) / U	
	Check for fire prevention: no smoking, use of non sparking tools, proper use of Hot Work Permits as needed.	(A) / U	
	Sump and Containment: Check for accumulations of stormwater, contaminants, or deterioration.	(A) / U	
Light Liquid Pumps	Visually check all pumps, valves, flanges, pressure relief devices, and connections for evidence of leaks.	(A) / U	
Truck Bay	Check: Evidence of spills in the containment or sump.	(A) / U	
	Check hoses for signs of wear, leakage, or other damage; hose couplings for proper seals and leaks or other damage.	(A) / U	

INSPECTION COMPLETED BY: Kay Hittler

***** DEFICIENCIES AND CORRECTIONS ARE DETAILED IN THE REFERENCED REMEDIAL WORK ORDERS *****

CLEAN HARBORS, KANSAS, L.L.C.
DAILY INSPECTION LOG

FOR THE DAY OF January 20, 2006

TIME: 2:40pm

INSPECTION UNIT	PROCESSING AREA:		
INSPECTION ITEM	ELEMENT	STATUS	OBSERVATION/ REMEDIAL WORK ORDERS ISSUED
Tank Farm	Check containment and perimeter for wet spots.	(A) / U	
	Check for cracks or general deterioration of the concrete.	(A) / U	
	Coating integrity: check for cracks, gaps, flaking, chips, gouges, or other signs of wear.	(A) / U	
	Sumps: check for accumulations of storm-water, contaminants, or deterioration.	(A) / U	

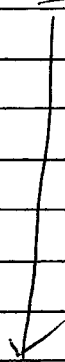
INSPECTION COMPLETED BY: Kayne Heltz

***** DEFICIENCIES AND CORRECTIONS ARE DETAILED IN THE REFERENCED REMEDIAL WORK ORDERS *****

**CLEAN HARBORS, KANSAS, L.L.C.
DAILY INSPECTION LOG**

FOR THE DAY OF January 20, 2006

TIME: 245 pm

INSPECTION UNIT: FLAMMABLE TANKS		ELEMENTS					
INSPECTION ITEM:	Leaks & Corrosion	Foundation Integrity	Piping Integrity	Protective Coating	Cap Closed	Pressure Relief Hatch (where appl)	OBSERVATION/ REMEDIAL WORK ORDERS ISSUED
V - 1	A / U	A / U	A / U	A / U	A / U	N / A	NOT IN USE
V - 2	A / U	A / U	A / U	A / U	A / U	A / U	
V - 3	A / U	A / U	A / U	A / U	A / U	N / A	
V - 4	A / U	A / U	A / U	A / U	A / U	N / A	
V - 5	A / U	A / U	A / U	A / U	A / U	A / U	
V - 6	A / U	A / U	A / U	A / U	A / U	A / U	
V - 7	A / U	A / U	A / U	A / U	A / U	N / A	
V - 8	A / U	A / U	A / U	A / U	A / U	N / A	
V - 17	(A) / U	(A) / U	(A) / U	(A) / U	(A) / U	N / A	
Misc. Units: Drum Scraper	A / U	A / U	A / U	A / U	A / U	N / A	NOT
Disperser (V-26)	A / U	A / U	A / U	A / U	A / U	N / A	IN
Drum Washer	A / U	A / U	A / U	A / U	A / U	N / A	USE

INSPECTION COMPLETED BY: 

***** DEFICIENCIES AND CORRECTIONS ARE DETAILED IN THE REFERENCED REMEDIAL WORK ORDERS *****

**CLEAN HARBORS, KANSAS, L.L.C.
DAILY INSPECTION LOG**

FOR THE DAY OF January 20, 2006

TIME: 248pm

INSPECTION UNIT/ AREA: H BUILDING: Operations Shack			
INSPECTION ITEM	ELEMENT	STATUS	OBSERVATION/ REMEDIAL WORK ORDERS ISSUED
Log Books	Check to ensure that log entries are made daily and the logs are kept in a designated location.	A / U	NOT IN.
	Check on the following table to ensure that tank strappings are recorded daily for each tank.	A / U	USE

INSPECTION UNIT/ AREA: H BUILDING: Operations Shack																		
INSPECTION ITEM: Tank Strappings Log																		
V1	V2	V3	V4	V5	V6	V7	V8	V9	V10	V11	V12	V13	V14	V15A	V15B	V15C	V15D	V16
Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N

INSPECTION COMPLETED BY: Kayla Heth

***** DEFICIENCIES AND CORRECTIONS ARE DETAILED IN THE REFERENCED REMEDIAL WORK ORDERS *****

CLEAN HARBORS, KANSAS, L.L.C.
DAILY INSPECTION LOG

FOR THE DAY OF January 20, 2006

TIME: 3:00pm

INSPECTION UNIT	BUILDING C:		
INSPECTION ITEM	ELEMENT	STATUS	OBSERVATION/ REMEDIAL WORK ORDERS ISSUED
Container Storage	Two foot minimum aisle space between piles of drums.	(A) / U	
	Check for fire prevention: no smoking, use of non sparking tools, proper use of Hot Work Permits as needed.	(A) / U	
	Loading/unloading areas: check for evidence of spills or accumulated liquids.	(A) / U	
	Floors: check for accumulations of liquids or contaminants.	(A) / U	

INSPECTION UNIT	Drum Dock:		
INSPECTION ITEM	ELEMENT	STATUS	OBSERVATION/ REMEDIAL WORK ORDERS ISSUED
Container Storage	Two foot minimum aisle space between piles of drums.	(A) / U	
	Loading/unloading areas: check for evidence of spills or accumulated liquids.	(A) / U	
Waste Acceptance	Check trucks and vans in dock and in yard: incoming loads must be placed in a Container Management Unit within 72 hours of arrival.	(A) / U	

INSPECTION COMPLETED BY: Kay Helt

***** DEFICIENCIES AND CORRECTIONS ARE DETAILED IN THE REFERENCED REMEDIAL WORK ORDERS *****

Session 6026

Location: Wichita, KS Course Date: 10/11/04

Course Name: Annual RCRA + Contingency Plan Training Course Code(s): ET3050

Course Duration: 4 hours

[illegible]

Instructor Name: C. Brian Key
General Manager: C. Brian Key
Date: 10/11/04

Instructor Signature: Charles Brunkley

GM Signature: CB

Page# 1 of 1

Location:

Wichita

Course Date:

6/12/06

Course Name:

Annual RCRA Training

Course Code(s):

ET3050

Course Duration:

4 hours

Employee ID #

Employee Name

Signature

Instructor's Initials

Nate Embury
C. Brunkley

CBKey

Charles Brunkley

Ex. 6 PII

Instructor Name:

C. Brunkley

General Manager:

CBKey

Date:

6/12/06

Instructor Signature:

CBKey

GM Signature:

CBKey

Page#

of

Name:

Clean Harbors

Documents Given to Facility Personnel	YES
Notice of Compliance / Non-Compliance	✓
Hazardous Waste Generator Handbook	
Hazardous Waste K.S.A. & K.A.R. Book	✓
Solid Waste K.S.A. & K.A.R. Book	
Spill Prevention Control and Countermeasure (SPCC Packet)	
Hazardous Waste Technical Guidance Documents	
Closed Containers (HW 97-03)	
Container Management for Hazardous Waste Generators (HW 05-01)	
Management of Used Antifreeze (HW 97-02)	
Notification Requirements For Large Quantity Handlers of Universal Waste (HW 01-01)	
Petroleum Product Mixed with Water (HW 97-01)	
Recycling and Disposal of Aerosol Cans (HW 02-02)	
Solvent Contaminated Towels or Rags (HW 95-02)	
Spent Fluorescent Lamps Containing Mercury (HW 95-01)	
Use of Evaporation Units (HW 95-03)	
Used Oil Collection Centers (HW 00-01)	
Used Oil Generators (HW 99-01) 12-2004	
Used Oil: On-site Burning in Space Heaters (HW 98-02)	
Waste Medical and Photographic Film (HW 02-01)	
Solid Waste Technical Guidance Documents	
Annual Reviews and Revisions Solid Waste Management Plans (SW 97-04) 05-2005	
Beneficial Use of Waste Tires (SW 03-02) 08-01-2003	
Construction Demolition Wastes and Clean Rubble (SW 94-02)	
Disposal of Spoiled or Contaminated Grain (SW 98-06)	
Disposal Options for Small Quantities of Dead Animals (SW 94-01) 05-2004	
Disposal Options for Large Quantities of Dead Animals (SW 01-01)	
Disposal Options for X-ray Machines (SW 98-03)	
HHW Management at MSWLF and Transfer Stations (SW 04-01) 01-2004	
HHW Eight-Hour Refresher Training (03-2005)	
Management Requirements for Specified Risk Material (SW 05-02)	
Medical Services Waste (SW 00-01)	
Minimization and Disposal of Transfer Station Washdown Wastewater (SW 98-02)	
Mud Trap Wastes (SW 94-03)	
Sampling Analysis Plan Development for Industrial Landfills (SW 03-01) 06-20-2003	
Sampling Analysis Plan Development for MSWLF (SW 96-02) 07-2003	
Sampling Analysis Plan for Small Arid Landfills (SW 97-03)	
Small Yard-Waste Composting (SW 97-01)	
White Goods Storage, Recycling, and Disposal (SW 95-02)	
Waste Screening and General Operation at C&D Landfills (SW 02-01) 02-2004	
Examples of Regulatory Documents	
Arrangements with Outside Emergency Response Agencies	
Contingency Plan	
Hazardous Training Records Form	
Job Description	
Emergency Information for Kansas Generators	
Weekly Inspection Log	
C&D Load Refusal Log or Non-C&D Waste Return	
C&D Recycled Waste Log	
C&D Waste Screening & Disposal Log	
Inspector <i>Dellie Train</i>	Date <i>7/20/06</i>

APPENDIX

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
DIVISION OF ENVIRONMENT
Bureau of Environmental Field Services
Waste Management Programs
Southcentral District Office

Name of Site: Clean Harbors Kansas, LLC
Address: 2549 N. New York Wichita, KS 67219
Legal: GPS 37.72894, -97.31817

EPA ID/Permit No.: KSD 007 246 846
County: Sedgwick
Taken By: Debbie Travis

Photograph's were not altered except to change the size of the file.



Picture No.: 1
Date: June 19, 2006
Time: Refer to the photograph.
General Direction Faced: West
Weather Conditions: Na
Type of Camera: Sony Cyber-shot
Comments:
Building B:
Empty section of the building



Picture No.: 2
Date: June 19, 2006
Time: Refer to the photograph.
General Direction Faced: East
Weather Conditions: Na
Type of Camera: Sony Cyber-shot
Comments:
Building B:
This area contains a few tables and two empty flammable storage cabinets.

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
DIVISION OF ENVIRONMENT
Bureau of Environmental Field Services
Waste Management Programs
Southcentral District Office

Name of Site: Clean Harbors Kansas, LLC

Address: 2549 N. New York Wichita, KS 67219

Legal: GPS 37.72894, -97.31817

EPA ID/Permit No.: KSD 007 246 846

County: Sedgwick

Taken By: Debbie Travis

Photograph's were not altered except to change the size of the file.



Picture No.: 3

Date: June 19, 2006

Time: Refer to the photograph.

General Direction Faced: Building C

Weather Conditions: Na

Type of Camera: Sony Cyber-shot

Comments:

Two trash roll-offs. The roll-off on the left that is labeled "Dumpy" contains hazardous waste.



Picture No.: 4

Date: June 19, 2006

Time: Refer to the photograph.

General Direction Faced: Building C

Weather Conditions: Na

Type of Camera: Sony Cyber-shot

Comments:

Close-up photograph of the waste inside the roll-off shown on the left in photograph 3. The roll-off contains contaminated floor dry sweepings and blue gloves. In the left upper corner of the photograph, there is a plastic bag that contains a contaminated light green absorbent pad, white Tyvek suit, and gloves.

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
DIVISION OF ENVIRONMENT
Bureau of Environmental Field Services
Waste Management Programs
Southcentral District Office

Name of Site: Clean Harbors Kansas, LLC
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Legal: GPS 37.72894, -97.31817

EPA ID/Permit No: KSD 007 246 846
County: Sedgwick
Taken By: Debbie Travis

Photograph's were not altered except to change the size of the file.



Picture No.: 5
Date: June 19, 2006
Time: Refer to the photograph.
General Direction Faced: Building C
Weather Conditions: Na
Type of Camera: Sony Cyber-shot
Comments:
Close-up photograph of the waste shown in photograph 4.



Picture No.: 6
Date: June 19, 2006
Time: Refer to the photograph.
General Direction Faced: Building C
Weather Conditions: Na
Type of Camera: Sony Cyber-shot
Comments:
The plastic bag shown in the left corner of photograph 4. The green absorbent pad is contaminated with an unknown material.

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
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Bureau of Environmental Field Services
Waste Management Programs
Southcentral District Office

Name of Site: Clean Harbors Kansas, LLC
Address: 2549 N. New York Wichita, KS 67219
Legal: GPS 37.72894, -97.31817

EPA ID/Permit No: KSD 007 246 846
County: Sedgwick
Taken By: Debbie Travis

Photograph's were not altered except to change the size of the file.



Picture No.: 7
Date: June 19, 2006
Time: Refer to the photograph.
General Direction Faced: Building C
Weather Conditions: Na
Type of Camera: Sony Cyber-shot
Comments:
A close-up photograph of the green absorbent contaminated pad shown in photograph 6



Picture No.: 8
Date: June 19, 2006
Time: Refer to the photograph.
General Direction Faced: Building C
Weather Conditions: Na
Type of Camera: Sony Cyber-shot
Comments:
The contaminated Tyvek suit that was inside the plastic bag shown in photograph 6. The yellow stains are the unknown contamination.

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
DIVISION OF ENVIRONMENT
Bureau of Environmental Field Services
Waste Management Programs
Southcentral District Office

Name of Site: Clean Harbors Kansas, LLC
Address: 2549 N. New York Wichita, KS 67219
Legal: GPS 37.72894, -97.31817

EPA ID/Permit No.: KSD 007 246 846
County: Sedgwick
Taken By: Debbie Travis

Photograph's were not altered except to change the size of the file.



Picture No.: 9
Date: June 19, 2006
Time: Refer to the photograph.
General Direction Faced: Building C
Weather Conditions: Na
Type of Camera: Sony Cyber-shot
Comments:
Close-up photograph of the yellow contamination on the Tyvek suit shown in photograph 8.



Picture No.: 10
Date: June 19, 2006
Time: Refer to the photograph.
General Direction Faced: West
Weather Conditions: Na
Type of Camera: Sony Cyber-shot
Comments:
Building D:
Empty section of the building.

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
DIVISION OF ENVIRONMENT
Bureau of Environmental Field Services
Waste Management Programs
Southcentral District Office

Name of Site: Clean Harbors Kansas, LLC

Address: 2549 N. New York Wichita, KS 67219

Legal: GPS 37.72894, -97.31817

EPA ID/Permit No: KSD 007 246 846

County: Sedgwick

Taken By: Debbie Travis

Photograph's were not altered except to change the size of the file.



Picture No.: 11
Date: June 19, 2006
Time: Refer to the photograph.
General Direction Faced: Southwest
Weather Conditions: Na
Type of Camera: Sony Cyber-shot
Comments:
Building D:
Empty section of the building. The horizontal storage tanks are located in the rafters of the ceiling.



Picture No.: 12
Date: June 19, 2006
Time: Refer to the photograph.
General Direction Faced: West
Weather Conditions: Na
Type of Camera: Sony Cyber-shot
Comments:
Building I:
Empty section of the building. The liquid on the floor is water. The roof leaks in this building.

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
DIVISION OF ENVIRONMENT
Bureau of Environmental Field Services
Waste Management Programs
Southcentral District Office

Name of Site: Clean Harbors Kansas, LLC

Address: 2549 N. New York Wichita, KS 67219

Legal: GPS 37.72894, -97.31817

EPA ID/Permit No: KSD 007 246 846

County: Sedgwick

Taken By: Debbie Travis

Photograph's were not altered except to change the size of the file.



Picture No.: 13
Date: June 19, 2006
Time: Refer to the photograph.
General Direction Faced: East
Weather Conditions: Na
Type of Camera: Sony Cyber-shot

Comments:
Building I:
Empty section of the building. The 55-gallons drums shown on the left are empty. The liquid on the floor is water. The roof leaks in this building.



Picture No.: 14
Date: June 19, 2006
Time: Refer to the photograph.
General Direction Faced: West
Weather Conditions: Na
Type of Camera: Sony Cyber-shot

Comments:
Building J:
Empty section of the building.

DIVISION OF ENVIRONMENT
Bureau of Environmental Field Services
Waste Management Programs
Southcentral District Office

Name of Site: Clean Harbors Kansas, LLC

Address: 2549 N. New York Wichita, KS 67219

Legal: GPS 37.72894, -97.31817

EPA ID/Permit No: KSD 007 246 846

County: Sedgwick

Taken By: Debbie Travis

Photograph's were not altered except to change the size of the file.



Picture No.: 15

Date: June 19, 2006

Time: Refer to the photograph.

General Direction Faced: East

Weather Conditions: Na

Type of Camera: Sony Cyber-shot

Comments:

Building J:

Empty section of the building.



Picture No.: 16

Date: June 19, 2006

Time: Refer to the photograph.

General Direction Faced: Northwest

Weather Conditions: Na

Type of Camera: Sony Cyber-shot

Comments:

Drum Dock Area connected to building C.

The containers are 10-day storage.